

Compliance Assessment Report CAR_NRW0050071

Permit being assessed: CB3237AP.

For: Gwynedd Skip And Plant Hire Ltd, **held by:** Gwynedd Skip And Plant Hire Ltd

At: Lon Hen Felin, Cibyn Ind Est, Caernarfon, Gwynedd, LL55 2BD.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 21/01/2026.

Parts of permit assessed: As below. .

NRW Lead Officer: Nia Brunning.

Report sent to: Alan Hughes, Company Director, on 18/06/2026.

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	C2 Significant	1.1.1(a)
W2A - Waste - Operations - Permitted activities	C2 Significant	Table S2.1

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

Total non-compliances recorded	Total non-compliance score
2	62

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	Further amendments required to site Environmental Management System (EMS) as outlined below.	30/04/2026
W2A	Comply with 75,000 tonnes maximum throughput capacity.	31/12/2026

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Natural Resources Wales (NRW) have expressed concerns about the lack of adequate written procedures for managing trommel fines and ensuring compliance with Landfill Tax legislation within Gwynedd Skip & Plant Hire Limited's (GSPHL) Environmental Management System (EMS) following site inspections carried out at the company's waste transfer station on the 25 June 2024 and 19 May 2025.

Following these inspections, actions were set requiring updates to the site's Environmental Management System (EMS) to correct inaccuracies and address several procedural gaps within the document.

An Environmental Management System (EMS) is a structured framework that enables an operator to manage its environmental responsibilities effectively and systematically. Its purpose is to ensure compliance with environmental laws and regulations, identify and control environmental risks, and promote continuous improvement in environmental performance.

NRW received an updated Environmental Management System (EMS) for GSPHL on the 30 September 2025. The EMS is structured into multiple folders containing 61 individual documents which was prepared by a third-party consultant.

NRW have reviewed the EMS, and our comments are outlined below.

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 the 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.

Site Plan

The site plans submitted as part of the EMS does not meet the requirements set out on page 21 of the "how to comply with your environmental permit" guidance: [How to comply with your environmental permit](#)

The site plans do not confirm:

- the location of any waste activities such as storage areas for all waste.
- the location of any oil and chemical storage facilities.
- important or sensitive local receptors such as neighbours, sensitive wildlife areas, rivers and underlying groundwaters.

ACTION: Please update the site plans with the requirements noted above.

Waste Storage

Page 35 of the "how to comply with your environmental permit" guidance specifies waste storage procedures which must be included in the site EMS. These include:

- storage times and procedures to ensure that these times are not exceeded.
- maximum storage capacities for specified storage areas and the facility as a whole and procedures to ensure that these capacities are not exceeded.
- maximum storage heights to prevent or minimise the emission of dust, litter and throughput management.
- procedures to segregate incompatible wastes for example use of appropriate separation distances and or suitable engineering measures.

Some waste storage procedures are outlined in document "BCP 02 b"; however, NRW have identified the following gaps:

- No procedures are listed explaining how storage times are monitored.
- Waste stockpiles are not shown on a site plan.
- Stockpile heights must be limited to 4 metres in accordance with Fire Prevention and Mitigation Guidance (FPMP). Currently, the EMS records a maximum stack height of 5 metres for household and commercial waste.
- Maximum stockpile widths are not defined as required by FPMP guidance.
- Minimum separation/fire break distances between all waste or baled waste stacks and between buildings and waste/baled waste stacks, are not defined.

With GSPHL continuing to accept waste volumes exceeding their 75,000-tonne permit threshold, it is imperative for the company to implement and maintain rigorous waste storage procedures. These measures are essential to safeguard site operations, prevent environmental harm, and minimise potential impacts on neighbouring communities.

NRW also understands that GSPHL is in the process of updating its Fire Prevention and Mitigation Plan (FPMP) and requests that the updated version be shared with NRW once completed.

ACTION: Develop waste storage procedures as outlined above.

Waste Blending

Consultants acting on behalf of GSPHL have stated in correspondence with NRW that the company's operations do not involve mixing or blending separate waste types.

Under Section 2 of EMS document "BCP 02b - Waste Storage Operations" it is stated that "Soil/fines that fall through the rotating drum mesh into a bay beneath the screen will be mixed in with the inert waste stockpile".

This statement conflicts with the information previously supplied to NRW in relation to waste blending. These inconsistencies create confusion and undermine the regulator's confidence in the effectiveness and compliance of the operator's Environmental Management System (EMS).

NRW have provided further clarification regarding the differences between the bulking up and blending of wastes in Compliance Assessment Report - NRW_CAR0048623.

The blending of wastes is not a listed treatment operation in table S1.1 of environmental permit EPR/CB3237AP.

ACTION: GSPHL are not permitted to blend different types of wastes.

Trommel fines must be disposed of independently and not be blended with different types of wastes.

The site EMS must be amended to reflect these limitations, and the operator must ensure that all waste blending activities are ceased immediately.

WRAP Quality Protocol

In September 2024, GSPHL finalised a Factory Production Control Document which would enable the company to produce recycled aggregates in accordance with the WRAP Quality Protocol.

These operating documents are saved in the EMS under a folder named "waste procedures".

Also saved under this folder is a operating diagram for the sites Materials Recovery Facility (MRF).

A major limitation of the WRAP Quality Protocol is that it excludes 19 12 12 recycled aggregates separated by a Materials Recovery Facility (MRF) from qualifying for end-of-waste status.

An MRF process does not guarantee that all contaminants such as fines, wood fragments, ferrous and non-ferrous metals, plastics, rubber, gypsum, and other impurities will be eliminated to the stringent specification necessary for achieving end-of-waste status under

the WRAP Quality Protocol.

The MRF's diagram in the EMS states that "hardcore" will become a "6F5 product" following analysis. This is a vague description which does not comply with input or sampling requirements of the WRAP Quality Protocol.

ACTION: This procedure shown in the MRF diagram must be removed, and waste controls apply for all LoW 19 12 12 recycled aggregates segregated by GSPHL's MRF.

The onward recovery or disposal of LoW 19 12 12 recycled aggregates produced by GSPHL must be made at sites which benefit from a suitable exemption or environmental permit.

Trommel fines procedures

GSPHL's EMS contains a new waste fines sampling procedure dated the 1 May 2025.

This document states how GSPHL produce approximately 4000 tonnes of waste fines from the mechanical treatment of mixed wastes each month.

NRW have previously provided advice to GSPHL on waste types which can produce "qualifying fines" as documented in the Landfill Disposals Tax (Wales) Act of 2017 and Landfill Tax (Qualifying Material) Order 2011.

Schedule 1 of the Landfill Disposal Tax (Wales) Act of 2017 specifies which wastes qualify as low rate materials as follows:

Group	Materials	Conditions
1	Rocks and soil	Naturally occurring
2	Ceramic or concrete material	
3	Minerals	Processed or prepared
4	Furnace slags	
5	Ash	
6	Low activity inorganic compounds	
7	Calcium sulphate	1 The environmental permit relating to the site at which the material is disposed of authorises landfill disposals of non-hazardous waste only. 2 The material is disposed of in a cell that does not contain any biodegradable waste.
8	Calcium hydroxide and brine	Disposed of in a brine cavity

GSPHL's current waste fines sampling procedure does not adequately recognise that fines generated from mixed waste streams cannot be automatically classified as "qualifying fines."

Failure to incorporate this step into the procedure introduces a compliance risk, as misclassification could result in incorrect landfill tax application and regulatory conformance involving the transfer of the trommel fines.

Mixed waste streams typically contain a combination of materials, including organics, plastics, wood, metals, and possibly hazardous substances. This variability means they cannot meet the strict inert criteria.

Section 3.1 of GSPHL's waste fines procedure describes the production of "qualifying fines" from mixed construction and demolition waste streams processed in the MRF building.

However, this treatment method does not achieve sufficient segregation to ensure that fines originate solely from qualifying materials. As a result, the criteria set out in the Landfill Tax (Qualifying Materials) Orders cannot be met when processing mixed waste streams.

Furthermore, the procedure does not align with statements previously made by GSPHL to NRW, which indicated that the company operate two distinct processes:

1. A process producing fines exclusively from wholly inert waste; and
2. A separate process within the MRF building for fines qualifying for the standard rate of landfill tax.

This inconsistency between documented procedures and declared operational practices

presents a compliance risk and NRW risks misclassification of trommel fines.

Misclassification of trommel fines also presents an environmental risk. Trommel fines often contain biodegradable material, plastics, and other contaminants that can generate leachate, greenhouse gases, and attract vermin when disposed of incorrectly.

ACTIONS:

1) Amend the May 2025 Waste Fines Sampling Procedure to explicitly reference waste types that qualify as “qualifying materials” under the *Landfill Disposals Tax (Wales) Act 2017* and the *Landfill Tax (Qualifying Material) Order 2011*. The procedure must also confirm that fines produced from mixed waste streams cannot meet these criteria without appropriate analysis and therefore cannot be automatically classified as qualifying fines.

2) Develop a documented process detailing how GSPHL will manage and dispose of trommel fines that do not meet the qualifying materials criteria, ensuring compliance with landfill tax obligations.

3) Clarify operational arrangements by confirming whether trommel fines are produced via two distinct production lines:

- One for wholly inert waste; and
- One for mixed waste streams.

4) Identify and formally record the Technical Manager responsible for trommel fines sampling, analysis, and interpretation, ensuring accountability and competence.

Waste Descriptions and List of Wastes (LoW)

Document "BCP 03 Waste Removal and Disposal" contains a list of EWC codes also known as LoW which are used for records leaving GSPHL's waste transfer station.

The document describes LoW code 19 12 09 as “bricks and rubble.” This description is incorrect, as the appropriate description for this code is mineral waste, such as sand and stones. The correct LoW code for non-hazardous recycled aggregate produced through mechanical treatment is 19 12 12.

The LoW code for soils and fines is listed as 19 12 12. This is not wholly accurate, as soils and fines may alternatively be classified as 19 12 11* depending on the outcome of sampling analysis. This distinction should be clearly reflected within the document.

LoW code 19 12 10 is not included in the document, despite GSPHL routinely exporting waste under this code as refuse-derived fuel (RDF). This code should therefore be added to the document.

Accurate List of Waste (LoW) codes ensure that waste is managed in accordance with

legislation and permit conditions. It also helps identify the nature and potential hazards of waste, enabling appropriate handling, treatment, and pollution prevention measures.

Consistent and accurate waste descriptions demonstrate effective management control and supporting traceability and regulator confidence in site operations.

ACTION: GSPHL are required to correct the LoW codes listed in document "BCP 03 Waste Removal and Disposal" to comply with these requirements.

EMS review summary

A site Environmental Management System (EMS) is the cornerstone of environmental protection. The Category 2 breach of permit condition 1.1.1(a) reflects multiple failures within the site's Environmental Management System, indicating a systemic failure by the operator to minimise the risk of pollution. In this case, those failures also include the root cause of the continued permitted waste exceedance, which also constitutes a breach of W2A. The assignment of a Category 2 score therefore reflects all noted failures of the management system and the increased risk of a significant incident occurring at the site.

NRW issue a further CCS 2 score against permit condition 1.1.1(a).

Amendments to the site EMS must be made and submitted to NRW for review by the 30 April 2026.

W2A - Permitted activities

Permit condition Table S2.1 - The maximum quantity of waste to be accepted on site shall not exceed 75,000 tonnes per year.

A review of waste returns submitted by GSPHL confirm the site has accepted the following quantities of wastes in 2025:

Quarter 1 2025 - 28,421 tonnes.

Quarter 2 2025 - 34,397 tonnes.

Quarter 3 2025 - 22,743 tonnes.

Totalling 85,561 tonnes without the addition of quarter 4 2025.

NRW did not receive the action plan referenced in CAR_NRW0048623, which was intended to detail the monitoring measures and preventative actions GSPHL would implement to avoid exceeding the 75,000 tonne permitted waste limit in 2025.

NRW have issued a CCS Category 2 score against permit condition S2.1.

The Category 2 breach of permit condition 2.3.2 and the limits specified in table S2.1 reflects persistent exceedance of permitted limits over an extended period and the increased risk of significant incident associated with handling wastes in excess of limits that have been fully risk assessed by us via an environmental permit variation. NRW are now considering enforcement action in relation to this escalating and reoccurring permit breach.

If GSPHL wish to discuss the content of this CAR further, please do not hesitate to contact us.

"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.