

Compliance Assessment Report CAR_NRW0052075

Permit being assessed: GP3692LQ.

For: RMR Recycling Ltd, **held by:** RMR Sand and Aggregates Limited

At: Pen-y-Fan Pond Lane, Manmoel Road, Manmoel, Blackwood, Caerphilly, NP12 0HY.

Type of assessment: Site Inspection,

Reason: Routine.

On: 04/06/2026 between 10:00 and 13:00.

Parts of permit assessed: See comments section.

NRW Lead Officer: David Thomson, accompanied by Wayne Grimstead.

Report sent to: Redacted, Yard Manager, 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
IR1A - Installations - Management - General Management	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	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?

No action required.

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

Assessment Details

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (NRW) announced site inspection at RMR Recycling Limited (the operator) on 04 June 2026.

Discussions focussed on the recent permit variation application submitted by the operator as well as a recent report of alleged activities occurring outside of the permitted site boundary. In addition, a compliance assessment was carried out on general management / technical competence and monitoring of emissions to water.

This inspection also provided an opportunity for the recently appointed Industry Regulation Officer, responsible for regulating this site, to become familiar with site operations and activities and to meet the operator's management team.

The operator provided a comprehensive site walk through, including incoming waste receipt & storage, screening, sorting & crushing activities and the surface water drainage system which is connected to emission monitoring point W1.

Site Inspection Attendees

Natural Resources Wales

David Thomson [Senior Officer, Industry Regulation]

Wayne Grimstead [South-East Industry Regulation Team Leader]

RMR Recycling Limited

[Redacted] – Managing Director

[Redacted] – Director

[Redacted] – Yard Manager

Documents provided by the operator

Reference 1 – [Redacted] WAMITAB.pdf (date received – 05 June 2026)

Reference 2 – RMR Daily Inspection 05.01.2026.docx (date received – 05 June 2026)

Reference 3 – RMR Daily Inspection 10.02.2026.docx (date received – 05 June 2026)

Reference 4 – RMR Daily Inspection 18.03.2026.docx (date received – 05 June 2026)

Reference 5 – RMR Daily Inspection 30.04.2026.docx (date received – 05 June 2026)

Reference 6 – RMR Daily Inspection 01.05.2026.docx (date received – 05 June 2026)

Reference 7 – RMR Daily Inspection 01.06.2026.docx (date received – 05 June 2026)

Assessment Structure

Compliance Criteria (i.e., IR1A, IR2B and IR3E)

- a. Permit Condition
- b. Compliance Assessment
 - Compliance Classification Scheme (CCS)
 - Justification
 - Action
- c. Consolidation of Non-Compliance Score
- d. Root Cause Analysis (when applicable)

IR1A – Management – General Management**(a) Permit Condition**

Environmental permit condition 1.1.4 states:

The operator shall comply with the requirements of an approved competence scheme.

(b) Compliance Assessment

Under the CIWM (WAMITAB) Operator Competence Scheme, the operator must:

- Have a Technically Competent Manager (TCM) in place.
- Ensure that person is suitably qualified (e.g. Level 4).
- Ensure they maintain continuing competence (2-year cycle).
- Ensure they provide management and control of the permitted activities.

The Technical Competent Manager (TCM) for RMR Recycling Ltd. was present during the site inspection, demonstrating oversight and supervision of permitted activities.

A CIWM (WAMITAB) Level 4 Certificate for Inert Physical Treatment was submitted to NRW via email on 05 June 2026 (see reference 1). The certificate, dated 11 March 2025, falls within the required 2-year continuing competence cycle.

The above evidence demonstrates compliance with the CIWM (WAMITAB) Operator Competence Scheme and represents compliance with environmental permit condition 1.1.4.

Compliance Classification Scheme: *There is no evidence on non-compliance with permit condition 1.1.4*

Justification: *N/A*

Action: *No action required.*

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

IR2B – Operations – Permitted Activities**(a) Permit Condition**

Environmental permit condition 2.2.1 states:

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.

(b) Compliance Assessment

On 15 April 2026, NRW received an anonymous incident report about RMR Recycling Ltd. The caller claimed that the operator was storing and selling soil and other waste from an unlicensed location outside of the permitted site boundary as defined in schedule 7 (site plan) of the environmental permit.

During the site inspection, areas of the site boundary were observed at several locations with no evidence of material storage outside of the permitted site boundary identified which represents compliance with environmental permit condition 2.2.1.

Compliance Classification Scheme: *There is no evidence on non-compliance with permit condition 2.2.1*

Justification: *N/A*

Action: *No action required.*

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

IR3E – Emissions and Monitoring – Monitoring**(a) Permit Condition**

Environmental permit condition 3.5.1 states:

The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:

- (a) point source emissions specified in tables S3.1, S3.2 and S3.3*
- (b) surface water or groundwater specified in table S3.3;*

Table S3.2 to the environmental permit is partially reproduced below:

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements

Emission point ref. & location	Parameter	Source	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method.
W1 onsite plan schedule 7 emissions to Sirnhowy tertiary tributary watercourse	Oils and grease	Bypass interceptor	No visible oil or grease	Instantaneous	Weekly	Visual examination of discharge

(b) Compliance Assessment

Table S3.2 of the environmental permit specifies weekly visual inspections for oil and grease at emission point W1. The operator informed NRW that visual monitoring is carried out daily (Monday to Friday) by the TCM, with observations recorded in a daily inspection report.

To verify this, NRW requested 6 daily inspection reports for randomly selected dates. These were submitted by the operator via email on 05 June 2026 (see reference 2 to 7). Each report included comments regarding the condition of the water outlet, with no observations of oil or grease recorded. This demonstrates compliance with environmental permit condition 3.5.1.

Compliance Classification Scheme: *There is no evidence on non-compliance with permit condition 3.5.1*

Justification: *N/A*

Action: *No action required.*

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

Regulatory Advice and Guidance**Permit Variation Application**

In February 2026, the operator submitted a permit variation application to NRW. This application proposes the removal of Activity A1 (refer to Table S1.1 of the environmental permit) which relates to the heating of non-contaminated bituminous wastes for production of ready-to-use asphalt. Additionally, the application seeks an

increase in the annual waste acceptance limit from 75,000 tonnes to 250,000 tonnes.

At the time of the site inspection, the year-to-date (YTD) throughput was recorded as 46,822 tonnes. Based on current projections by the operator, the existing annual limit of 75,000 tonnes is expected to be exceeded during Q3 or Q4 2026. NRW advised the operator that exceeding this limit would constitute a breach of permit condition resulting in a non-compliance score in accordance with NRW Compliance Classification Scheme (CCS).

Furthermore, NRW informed the operator that if the 75,000-tonne limit was exceeded, a Schedule 5 Part A notification must immediately be submitted to NRW as this is a requirement of the environmental permit. Failure to notify NRW without delay would also constitute a further permit condition breach. The operator understood the implications and was keen to request that NRW permitting team determines the variation application at the earliest opportunity.

[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.