

Compliance Assessment Report CAR_NRW0052131

Permit being assessed: BB3990ZX, **Deployment reference:** PAN-029757.

For: Mobile Plant, **held by:** Beacon Foods Limited

At: .

Type of assessment: Report/Data Review,

Reason: Routine.

On: 17/06/2026.

Parts of permit assessed: Management System.

NRW Lead Officer: Alder Tye.

Report sent to: Paul Davies, TCM, 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	C3 Minor	2.1.1

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

Total non-compliances recorded	Total non-compliance score
1	4

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	Review and update your Environmental Management System to ensure that management controls, processes, and procedures are fully effective and reflect current operational practices	18/09/2026

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 was a routine review of data undertaken by Alder Tye (Waste Regulation Officer) following a request from NRW (Compliance Report CAR_NRW0051552, dated 17 April 2026) to submit the documents.

Permit breaches

W1A – General Management – Category 3 - Permit Condition 1.1.1

You have been scored with this Category 3 breach under permit condition 1.1.1 as mobile deployment PAN 029757 is not being operated in accordance with your written management system. This presents a foreseeable risk of environmental impact due to failures in management system implementation and control. No direct evidence of significant pollution has been identified. However, the absence of effective controls increases the likelihood of environmental harm occurring.

Permit condition 1.1.1 requires you to operate activities in accordance with a written management system. Your management system is a key control to assess how effectively you are protecting the environment, managing environmental risks from your activities, and making continual improvements. When a non-compliance with a permit condition is identified, it is likely to be the symptom of an underlying issue, or root cause within management controls.

Compliance report CAR_NRW0051552 identified a misclassification of waste (EWC 02 03 01) within submitted spreading records. A subsequent review has identified an additional misclassification within the annual waste transfer note ('Oct 2024 / Oct 2025') covering the same deployment period, where waste was classified as EWC 19 08 12. This is inconsistent with the EWC 02 03 05 applied within the deployment, spreading records, and email correspondence with NRW dated 10 April 2024 confirming which waste code should be applied.

It is the legal responsibility of the waste producer to ensure that all waste is described accurately before it is collected, disposed of or recovered. This is called the Waste 'Duty of Care' and ensures that waste is handled safely and only passed to people authorised to receive it. It is acknowledged that this has since been corrected. Spreading records, waste returns, and an annual waste transfer note ('Oct 2025/2026') have been resubmitted to NRW with EWC 02 03 05 being consistently used.

The correct classification and description of waste is a fundamental control to ensure that wastes are managed appropriately and that environmental risks are properly assessed prior to application to land. Misclassification creates a foreseeable risk of incorrect application of waste to land, with potential impacts on the environment, human health, and other sensitive receptors.

In your written management system, section 4.2.2 states that wastes must be accepted in line with deployments “under the same waste codes and descriptions”. Section 5.1.3 of your management system requires that “an auditing process verifies that operations have been conducted within planned schedules and to predetermined acceptance criteria”.

These controls have not been implemented effectively. Consequently, discrepancies in waste classification across multiple documents were not identified by your internal processes, indicating a failure in the application of documented management system procedures.

Ineffective implementation of management system controls, including auditing processes that verify compliance, increases the foreseeable risk of environmental harm. Without effective auditing, discrepancies and non-compliances may remain undetected, increasing the likelihood of waste being applied outside approved parameters.

Action: Review and update your Environmental Management System to ensure that management controls, processes, and procedures are fully effective and reflect current operational practices by **18 September 2026**.

Please refer to NRW guidance “*How to Comply with your Environmental Permit*”, available on the NRW website, for further guidance.

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.