

Compliance Assessment Report CAR_NRW0052169

Permit being assessed: CB3398ZF.

For: Forward Waste Management East Moors Road Hazardous Waste Transfer Station,
held by: Forward Waste Management Ltd

At: 122-128 East Moors Road, Cardiff, CF24 5EE.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 23/06/2026.

Parts of permit assessed: 1.1.

NRW Lead Officer: Dale Padfield.

Report sent to: ~, SHEQ Manager, on 23/06/2026.

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	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
IR1A	Action 1: Forward Waste 23rd June 2026: Review the CCRA and incorporate the missing aspects identified within this CAR form.	31/10/2026

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.

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**Forward Waste Management Ltd****EPR/CB3398ZF**

This compliance assessment report (CAR) details the light touch review of the operators Climate Change Risk Assessment (CCRA).

The submitted Climate Change Risk Assessment is site-specific and operationally relevant, demonstrating a reasonable understanding of how climate hazards could affect the hazardous waste transfer station. It identifies key risks such as fire from heat, flooding, infrastructure damage, and supply chain disruption, and proposes generally appropriate mitigation measures. However, when assessed against climate change guidance, the document is largely descriptive and current-state focused, rather than a forward-looking climate risk adaptation assessment. It lacks key elements such as climate projections, defined time horizons, structured risk evaluation, and governance arrangements. As a result, while it provides a useful baseline, it **does not yet demonstrate a robust, future-proofed assessment of climate risks** and requires improvement before we will accept it.

Gaps Identified

- **Absence of future climate context**
 - No reference to UK climate projections (e.g. UKCP18)
 - No assessment of short, medium, or long-term risks (e.g. 2030, 2050 scenarios)
- **Weak risk evaluation methodology**
 - All risks are assessed as “low” without clear justification
 - No defined scoring system (likelihood vs consequence)
 - Limited consideration of credible higher-risk scenarios (e.g. extreme events or control failure)
- **Lack of structured hazard pathway analysis**
 - No explicit linkage between **hazard** → **pathway** → **receptor** → **impact**
 - Environmental receptors (groundwater, surface water, air) not clearly defined or prioritised
- **Limited identification and prioritisation of critical receptors**
 - Assets and operations are mentioned, but not systematically prioritised

- No clear distinction between risks to:

- Environment
- Human health
- Infrastructure
- Compliance

- **No KPIs or measurable triggers**

- Absence of defined thresholds (e.g. temperature limits, rainfall triggers)
- No performance indicators to demonstrate controls are effective

- **No governance or review framework**

- No defined review frequency or update mechanism
- No assigned responsibility for maintaining the assessment
- No link to continuous improvement or lessons learned

- **Incomplete hazard coverage**

- No consideration of drought / water scarcity
- Limited consideration of compound or cascading risks (e.g. storm + power failure + flooding)

Hazardous Waste-Specific Gaps

- **Fire and thermal risk not fully challenged**

- Although heat-related fire risks are identified, there is:
 - No escalation scenario if thermal monitoring fails
 - No consideration of extreme heat scenarios increasing combustion risk
- Lithium battery and mixed hazardous waste risks not explicitly addressed

- **Containment and pollution pathways under extreme rainfall**

- Limited assessment of:
 - Drainage exceedance scenarios
 - Failure of interceptors or underground storage during intense storms
- No modelling or discussion of contaminant mobilisation pathways

- **Waste compatibility and stability under climate stress**

- No explicit consideration of:

- Increased volatility of chemicals in high temperatures
- Pressurisation of containers (e.g. aerosols, gases)
- Degradation of hazardous waste containers over time
- **Firewater and water resource resilience**
 - No assessment of water availability for:
 - Firefighting
 - Spill response
 - No contingency for drought conditions
- **On-site inventory and capacity risks**
 - Off-site disruption (transport/disposal) acknowledged, but:
 - No assessment of maximum storage capacity exceedance
 - No strategy for prolonged waste accumulation during disruption
- **Critical infrastructure dependencies**
 - No assessment of reliance on:
 - Power supply (for pumps, alarms, monitoring systems)
 - Emergency systems (e.g. fire detection, safety showers) under extreme conditions

Summary

Overall, the assessment demonstrates an understanding of current climate-related risks, but it falls short of NRW expectations for a forward-looking, evidence-based climate adaptation assessment. The key deficiencies relate to the absence of future climate scenarios, lack of structured risk evaluation and governance, and insufficient depth in hazardous waste-specific risk pathways. Addressing these gaps would significantly improve the robustness and regulatory acceptability of the assessment.

Action 1: Forward Waste 23rd June 2026: Review the CCRA and incorporate the missing aspects identified within this CAR form. **Due 31/10/2026.**

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.