

Compliance Assessment Report CAR_NRW0052214

Permit being assessed: BB3436RA.

For: Phase 2 Wrexham Recycling Park, **held by:** FCC Recycling (UK) Limited

At: Wrexham Recycling Park, Wrexham Industrial Estate, Wrexham, Clwyd, LL13 9UT.

Type of assessment: Site Inspection,

Reason: Routine.

On: 20/05/2026 between 09:40 and 12:40.

Parts of permit assessed: See Report.

NRW Lead Officer: Kathryn Bradshaw, accompanied by Hannah Ibbotson.

Report sent to: Site Manager, Site Manager, on 03/07/2026.

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)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR4A - Installations - Information - Records	Action only (X)	
IR4A - Installations - Information - Records	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
IR4A	Provide the initial test results of the waste water removed from site	17/07/2026

Criteria	Action needed	Complete by
IR4A	Provide Waste Transfer Notes (WTN)/Annual WTN for: - Fines 19 12 12 – Tudor Griffiths. Confirm waste carrier - Scrap metal 19 12 02 -Entrec - RDF – 19 12 10 – Ferrybridge. Confirm waste carrier - RDF – 19 12 10 – Viridor, Runcorn. Confirm waste carrier - Card/paper – 19 12 01 – Parry & Evans - Leachate – 19 07 03 – Severn Trent	17/07/2026

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.

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

This was a pre-arranged site inspection to complete a waste management audit of the Mechanical Biological Treatment (MBT) permit.

General waste (black bag waste) is accepted from Wrexham County Council and the waste is sorted, treated and processed before various waste streams are removed from site.

Plastics, metals and paper/cardboard are bulked up before removal from site. Some of the waste streams such as non-ferrous metals are moved to the Material Recycling Facility (MRF) permitted area (EPR/ZP3795ER) to be blended and bulked up.

Any non-conforming wastes identified along the picking lines are kept separate and removed utilising companies through the Household Waste Recycling Centres (HWRC).

Any fines produced from the waste processing are collected in skips and transported to a site for further recycling.

The residual waste that cannot be recycled is then shredded and placed in the bio-drying tunnels producing refuse derived fuel (RDF) which is then sent for incineration.

The biological waste treatment generates waste water which is removed off site as landfill leachate (19 07 03). This is a non-hazardous code and is sent to Severn Trent for further treatment and disposal. Initial tests were conducted on this waste but is only now tested at the receiving site and the operator is charged based on these tests. The operator is not routinely provided with the results.

Action

Provide the initial test results of the waste water removed from site by 17th July 2026.

Bulky waste (20 03 07) and waste carpets (20 01 11) are treated completely separately from all other wastes due to the risk of them containing Persistent Organic Pollutants (POP's). They completely by-pass the MBT process, are shredded and sent for incineration.

The site has an approved list of off-takers for all wastes which is managed through a central team. These off-take sites are subject to an annual desk top audit where permits, codes and licences are all checked as part of the due diligence. These sites are visually audited and inspected once every 3 years. The Operation Managers at the site have been trained on these processes and training records were viewed. Waste carriers are either the companies own or external contractors who are audited and checked to ensure compliance with relevant legislation.

Action

Provide Waste Transfer Notes (WTN) or annual WTN for the following wastes by 17th July 2026:

- Fines 19 12 12 – Tudor Griffiths. Confirm waste carrier
- Scrap metal 19 12 02 -Entrec
- RDF – 19 12 10 – Ferrybridge. Confirm waste carrier
- RDF – 19 12 10 – Viridor, Runcorn. Confirm waste carrier
- Card/paper – 19 12 01 – Parry & Evans
- Leachate – 19 07 03 – Severn Trent

If there are any supply issues with any waste off-takers a central team can assist with contingencies.

A full site walk round was conducted where we viewed all areas of the site incorporating both MBT and composting permitted areas. No issues were identified.

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.