

Compliance Assessment Report CAR_NRW0052216

Permit being assessed: BB3196CL.

For: Newtown Household Waste Recycling Centre, **held by:** Bryson Recycling Limited

At: Unit 4, Duffryn Industrial Estate, Newtown, Powys, SY16 3AJ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 16/06/2026 between 11:37 and 12:56.

Parts of permit assessed: See criteria below.

NRW Lead Officer: Alder Tye.

Report sent to: John Franks, Technically Competent Manager, on 02/07/2026.

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	1.1.1
W1A - Waste - Management - General management	C3 Minor	1.1.4
W3G - Waste - Emissions and monitoring - Fire	C3 Minor	3.1.1
W4B - Waste - Information - Reporting	C4 No impact	4.2.2

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

Total non-compliances recorded	Total non-compliance score
4	12.1

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	Empty the chem store to comply with the requirements in the EMS and FPMP. Provide evidence of this to NRW.	31/07/2026
W1A	Ensure that the TCM for the site is attending for, at least, the required minimum time and record this in the site diary.	31/07/2026

Criteria	Action needed	Complete by
	Provide evidence of this to NRW.	
W3G	Ensure that copies of the FPMP are available in the Emergency services Box and site office as specified in the FPMP and that a tamper tag is fitted to the Emergency Services Box. Provide evidence of this to NRW.	31/07/2026
W4B	Re-submit Q2, Q3 and Q4 waste returns for 2025/2026 and ensure waste returns are completed correctly.	31/07/2026

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.

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 Compliance Assessment Report is being produced following an inspection of Newtown Household Waste Recycling Centre. The inspection was conducted by Alder Tye (Waste Regulation Officer) accompanied by Luke Taylor (Senior Waste Regulation Officer) of Natural Resources Wales.

The weather at the time of the inspection was dry and bright with no wind, and the site was operational. Members of the public were arriving according to a booking system in place. The officers were met on the site by the Team Manager, who accompanied them throughout the inspection.

W1A - General Management - Permit Condition 1.1.1 - Category 3

Your permit states that you shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution. You have been scored a category 3 breach as hazardous waste in the chem safe store has not been managed in accordance with your Environmental Management System (EMS).

Section 3.7.5 of your EMS, specifically Table 4 'Waste Storage Table', includes details for Area 1 - the location of the red chem safe container. This table specifies that the maximum storage duration for waste storage in the chem safe is less than 4 weeks. This storage time frame of less than 4 weeks is also specified in section 4.5.1 Table 5 'Waste Storage Table', section 4.7.1 Table 6 'Waste storage/monitoring table (containers)', and Drawing

No.3408-NEWT-03 from your Fire Prevention Management Plan (FPMP).

During the site inspection, officers examined the red chem safe storage container. Site staff informed officers that the container had not been emptied since its installation, which was estimated to be approximately 10 months ago. Extended storage of hazardous materials increases the risk of container degradation, leaks, incompatible mixing, and potential pollution or fire incidents if not managed within appropriate timescales.

Action: Empty the chem store to comply with the requirements in the EMS and FPMP. Provide evidence of this to NRW by 31 July 2026

W1A - General Management - Permit Condition 1.1.4 - Category 3

Your permit states that you shall comply with the requirements of an approved competence scheme. In addition, NRW guidance document 'How to comply with your environmental permit' states that you must have a technically competent person to direct activities on your site and they must attend the site for a minimum period of time each week.

For tier 2 permits (this includes standard rules permits) the minimum attendance time for the Technically Competent Manager (TCM) to be on site to oversee operations is 20% of the operational time of the site. In the case of a site being operational for 38 hours a week- expected TCM attendance is 7.6hrs a week. A week runs from Sunday at midnight and ends on the following Sunday at midnight.

You have been scored a category 3 breach as your site diary/ staff and visitor records show that the minimum attendance time for the TCM to be present on site is not being met. Without a qualified person on site to oversee operations, there is a risk that the activities may give rise to pollution.

The site diary and the staff and visitors log, which records individuals attendance times on site, were checked during the inspection for TCM attendance. TCM attendance between 4 May 2026 and 14 June 2026 was as follows:

06/05/26- TCM attended

20/05/26- TCM attended

Action: Ensure that the TCM for the site is attending for, at least, the required minimum time and record this in the site diary, including start and finish times. Provide evidence of this to NRW by 31 July 2026

W3G - Fire- Permit Condition 3.4.1 - Category 3

Your permit states that you shall manage and operate activities in accordance with a written fire prevention plan.

Section 1.2.4 of your FPMP states that a copy of the FPMP will be located in the Emergency Services Box and and section 1.3.3 of states a copy will be kept at the site

office the location of which is shown on 'Drawing No. 3408-NEWT-03'.

No copy was made available to officers at either location at the time of inspection. You have been scored a category 3 breach as elements of the FPMP have not been implemented.

Access to your FPMP is essential to ensure that in the event of a fire, emergency responders can obtain critical information, such as site plans, contact details and local sensitive receptors, which can help to minimise potential environmental impacts. The document should also be readily accessible to site staff.

Additionally, the Emergency Services Box was not fitted with a tamper tag, and routine site checks failed to identify the absence of the FPMP, highlighting deficiencies in internal controls and auditing processes.

Action: Ensure that copies of the FPMP are available in the Emergency Services Box and site office as specified in the FPMP and that a tamper tag is fitted to the Emergency Services Box. Provide evidence of this to NRW by 31 July 2026.

W4B - Reporting - Permit Condition 4.2.2 - Category 4

You have been scored a Category 4 breach of the above permit condition because your quarterly returns for Q2, Q3, and Q4 2025/2026 did not accurately report waste received and removed.

Incoming rubble waste was incorrectly classified as EWC code 17 09 04 in Q2, Q3 and Q4. EWC code 17 09 04 is not listed in Table 2.2 of your permit and is therefore not permitted to be accepted at this site. The correct classification for this waste is EWC code 17 01 07 (mixtures of concrete, bricks, tiles, and ceramics other than those mentioned in 17 01 06).

Failure to accurately report waste streams may result in minor environmental pollution, as it prevents you from demonstrating compliance with your permit conditions, which are designed to protect the environment.

It was observed during the inspection that there was evidence of soil contamination in the rubble skip. Please monitor contamination of this waste stream. If it is observed to be significant, a separate skip for EWC code 20 02 02 (soil and stones) may be required.

Action: Re-submit Q2, Q3 and Q4 waste returns for 2025/2026 and ensure waste returns are completed correctly by 31 July 2026

If you wish to discuss this Compliance Assessment Report, please contact me:

alder.tye@cyfoethnaturiolcymru.gov.uk

Kind regards,

Alder Tye

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.