

Compliance Assessment Report CAR_NRW0052259

Permit being assessed: EB3430RT.

For: Wern Tarw Recycling Ltd, **held by:** Shillibiers Ltd

At: Village Farm Ind Est, Pyle, Bridgend, Mid Glamorgan, CF33 6BN.

Type of assessment: Site Inspection,

Reason: Routine.

On: 26/05/2026 between 10:05 and 10:45.

Parts of permit assessed: W1A, W2A, W3B, W4B .

NRW Lead Officer: Daniel Hopkin.

Report sent to: Leyton Shillibier , TCM , 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
W2A - Waste - Operations - Permitted activities	C3 Minor	2.1.1
W1A - Waste - Management - General management	C3 Minor	1.1.1
W1A - Waste - Management - General management	C3 Minor	1.1.3
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
W4B - Waste - Information - Reporting	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
3	12

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
W2A	Stop burning waste immediately. Provide evidence that all	24/07/2026

Criteria	Action needed	Complete by
	quarantined waste on site is being stored appropriately and has been disposed of to an authorised facility	
W1A	Ensure you are operating in line with your EMS	24/07/2026
W1A	Ensure all relevant paperwork is readily available and accessible to staff on site.	24/07/2026
W3B	Update your EMS to include information on how you manage dust emissions on site, these should include procedures conducted when likely processing will create dust, dry weather controls, sensitive receptors in the area, monitoring schedules, complaints record and procedures.	24/07/2026

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

Shillibier Haulage Limited – EPR/EB3430RT

Waste Regulation Officer Daniel Hopkin attended the permitted facility of Shillibier Haulage Limited at Unit 43, Village Farm Industrial Estate, Pyle, CF33 6BN on the 26th of May 2026. Shillibier Haulage Limited hold a bespoke licence for the site. This was a routine unannounced site inspection and a response to investigate further a dust report.

I was met by a member of staff who showed me around the site and answered my questions. The weather was very dry at the time of the visit and had been dry for the days leading up to the inspection. I arrived at 10:05.

There were breaches recorded during the visit that are detailed below.

W2A Permitted Activity – Category 3 (C3) Breach

Permit condition 2.1.1 states: ***“The License holder is authorised to carry out the activities specified in schedule 2. Table 2.1 (“the activities”).”***

We have issued you with a C3 breach of your permit under sub-criteria W2A Permitted Activities, due to the fire identified during the inspection. The reasonably foreseeable impact was minor, as burning waste could generate smoke, odour and ash residues with potential localised impact on air quality and amenity, and no significant off-site impact was

observed at the time of inspection.

During the inspection a fire was identified on site (see photo 1 below). Wood was being burnt that had been hand-picked from material delivered to the site prior to its processing. The site operator explained that waste is burned every couple of weeks as a means of disposal.



Photo 1

Your Environmental Management System (EMS) 10(i) states: ***“No fires are permitted on site”***. Burning of waste is not authorised at this site at any time. Any non-conforming waste

picked from incoming material must be quarantined in a designated area and disposed of via an appropriate authorised route.

Action: Stop burning waste immediately. Provide evidence that all quarantined waste on site is being stored appropriately and has been disposed of to an authorised facility. Please provide this by the 24th of July 2026.

W1A General Management – Category 3 (C3) Root Cause Breach

Permit condition 1.1.1 states: ***“The activities shall be managed and operated: (a) in accordance with a management system, which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents and non-conformances and those drawn to the attention of the licence holder as a result of complaints.”***

We have issued you with a C3 breach of your permit under sub criteria W1A General Management, as a root cause breach due to you not following your own Environmental Management System (EMS).

Failing to follow your EMS has resulted in unauthorised activities on site. Members of staff on site did not have access to the EMS, this oversight has caused an activity that was not permitted.

Action: Ensure you are operating in line with your EMS.

And

Permit condition 1.1.3 states: ***“Any persons having duties that are or may be affected by the matters set out in this license shall have convenient access to a copy of it kept at or near the place where those duties are carried out.”***

We have issued you with a C3 breach of your permit under sub criteria W1A General Management, due to required records not being available when requested during the site inspection.

The potential impact was considered minor, as the records did exist, however, restricted staff access could delay the site's ability to promptly demonstrate compliance, particularly during inspections or incidents requiring immediate access to key information.

During the inspection I requested to see paperwork relating to the site. There were some documents not available to see at the time. This indicates a failure to ensure relevant staff had convenient access to the licence and associated compliance documentation.

Action: Ensure all relevant paperwork is readily available and accessible to staff on site.

Advice and Guidance - Dust

We have received dust concerns from members of the public in relation to your site. During my inspection, I did not observe any dust emissions leaving the site. However, as the activities undertaken have the potential to generate dust, I requested to be shown the measures in place to control it.

The operator demonstrated the procedures followed when waste likely to cause dust is processed, which appeared appropriate for the activities on site. As the weather had been dry in the lead-up to the inspection, and remained dry on the day, it was likely that dust would be present on site.

The operator also explained that the ground is misted with water during dry conditions to minimise dust being blown around. This was consistent with my observations, as some areas of the site surface were visibly wet during the inspection.

Action: Update your EMS to include information on how you manage dust emissions on site, these should include procedures conducted when likely processing will create dust, dry weather controls, sensitive receptors in the area, monitoring schedules, complaints record and procedures. Please send the revised EMS to us by the 24th of July 2026.

W4B Reporting

I have completed a desktop review of your waste returns and these are all currently up to date compliant with permit condition 4.2.2. Thank you for continuing to submit these.

Thank you for your time during the inspection. The site inspection concluded at 10:45.

If you have any queries regarding this Compliance Assessment Report, please contact me on the details below.

Daniel Hopkin

Daniel.Hopkin@CyfoethNaturiolCymru.gov.uk

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.