

Compliance Assessment Report CAR_NRW0052077

Permit being assessed: QP3994FZ.

For: Caergyldhu Waste Management Facility, **held by:** Gwynedd Council

At: Cibyn Industrial Estate, Caernarfon, Gwynedd, LL55 2BD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 08/06/2026 between 13:15 and 14:51.

Parts of permit assessed: As Below.

NRW Lead Officer: Kieran Evans, accompanied by Cheryl Griffiths, Kevin Jones.

Report sent to: Endaf Williams, TCM, on 20/07/2026.

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	Action only (X)	
W2A - Waste - Operations - Permitted activities	C3 Minor	2.2.1
W2D - Waste - Operations - The site	Assessed (A)	
W2F - Waste - Operations - Technical requirements	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W3F - Waste - Emissions and monitoring - Pests	Assessed (A)	
W3G - Waste - Emissions and monitoring - Fire	Assessed (A)	
W4B - Waste - Information - Reporting	Action only (X)	
W4B - Waste - Information - Reporting	C3 Minor	4.2.2
W4C - Waste - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
2	8

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	Send an updated EMS to NRW once the current permit variation has been secured.	31/12/2026
W2A	Store and treat LoW 20 01 99 and LoW 20 03 01 as separate waste streams moving forward. The operator must stop and cease the blending of these waste streams moving forward.	01/09/2026
W4B	Classify bulky waste under the LoW code of 20 03 07 moving forward.	01/09/2026
W4B	Classify bulky waste under the LoW code of 20 03 07 moving forward. List LoW 20 01 99 under the correct waste code when leaving site on quarterly waste returns.	01/09/2026

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 an unannounced site visit, conducted on 9 June 2026. Weather conditions during the visit were fair and dry with minimal wind.

Representing Cyngor Gwynedd County Council (CGCC), were Site Technically Competent Manager (TCM): Endaf Williams, Senior Site Officer: Kelvin Williams, and Senior Site Officer: Robin Evans. Natural Resources Wales (NRW) were represented by Waste Regulation Officer Kieran Evans, Waste Regulation Officer Cheryl Griffiths and Waste Regulation Officer Kevin Jones.

During the time of our visit, the civic amenity waste reception area was busy, with members of the public attending the site and depositing waste into relevant containers provided by

the operator.

W1A - General Management

Permit condition 1.1.1 (a) states: "The operator shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints."

It is noted that NRW have access to an Environmental Management System (EMS) relating to this site dated the 17 December 2014.

In 2017, the site secured a permit variation, in order to allow the site to accept the following wastes:

- **LoW 20 01 99** - Other fractions not otherwise specified - consisting of source segregated absorbent hygiene products only.
- **LoW 20 03 01** - Mixed municipal waste.
- **LoW 20 03 03** - Street-cleaning residues.

During the application process, it was confirmed to NRW that the site's EMS was to be updated to reflect the addition of LoW 20 01 99 as an individual waste stream. At the time of application, a copy of the updated EMS was not requested.

It is understood that the site is currently in the process of securing a further variation, in order to expand the site's permitted boundary.

Once secured, please send an updated EMS to NRW for our records.

Permit condition 1.1.4 also states: "*The operator shall comply with the requirements of an approved competence scheme.*"

Whilst on site NRW officers were provided with a copy of TCM Endaf William's valid continuing competency certificate. It is also noted that at the time of the visit both Kelvin Williams and Robin Evans are in the process of completing continuing competence.

ACTION: Send an updated EMS to NRW once the current permit variation has been secured.

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Upholstered domestic seating containing Persistent Organic Pollutants (POPs)

During our visit it was explained to the operator, that a waste type of particular interest to NRW (across permitted waste facilities in general) is upholstered domestic seating containing POPs.

Examples of such domestic seating containing POPs are:

- sofas
- sofa beds
- armchairs
- kitchen and dining room chairs
- bean bags
- sofa cushions

Including any parts made of or containing leather, synthetic leather, other fabric or foam.

During the site visit, NRW were provided with transfer notes for "Bulky Waste" both coming in to, and leaving the site (for incineration at a permitted facility) under the (List of Wastes) LoW code of 20 03 07.

Transfer notes for upholstered domestic seating containing POPs must:

- describe the waste as: "domestic seating waste containing POPs"
- Be classified as LoW code 20 03 07
- You must list the relevant chemicals (POPs) on the waste transfer note

All waste domestic seating containing POPs, or mixed waste containing it, must be disposed of via incineration.

Further NRW guidance can be found here: [Natural Resources Wales / Manage waste upholstered domestic seating containing persistent organic pollutants \(POPs\)](#)

W2A - Permitted Activities

Permit condition 2.2.1 states: *The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").*

With reference to section A2 (*waste transfer station with treatment*) of permit table S1.1 activities are explicitly limited to: *"Treatment activities consisting only of:*

- *physical sorting,*
- *bulking up*

of waste into different components for recovery or disposal."

The site is permitted to accept source segregated absorbent hygiene products, via kerbside collection, under the LoW code of 20 01 99. As this waste is classified as offensive hygiene waste, colour coded yellow and black striped (tiger) bags are often used to clearly mark such waste. Both in written correspondence with CGCC prior to the visit, and during site visit itself, it was confirmed that the current site practice with offensive hygiene waste (LoW 20 01 99) is to mix it in to mixed municipal waste (LoW 20 03 01), leaving site as LoW 20 03 01.

With reference to the image below, yellow offensive hygiene waste bags (LoW 20 01 99) can clearly be seen mixed within the mixed municipal waste (LoW 20 03 01) pile. As previously mentioned, the activities in which the operator is permitted to conduct are limited

to physical sorting or bulking up, the site has no provision for mixing or blending of different LoW codes within its permit. Therefore moving forward, offensive hygiene waste (LoW 20 01 99) and mixed municipal wastes (LoW 20 03 01) will need to be stored, treated and leave the site as separate waste streams.

This permit breach will be scored as C3 - minor non-compliance against permit condition 2.2.1.

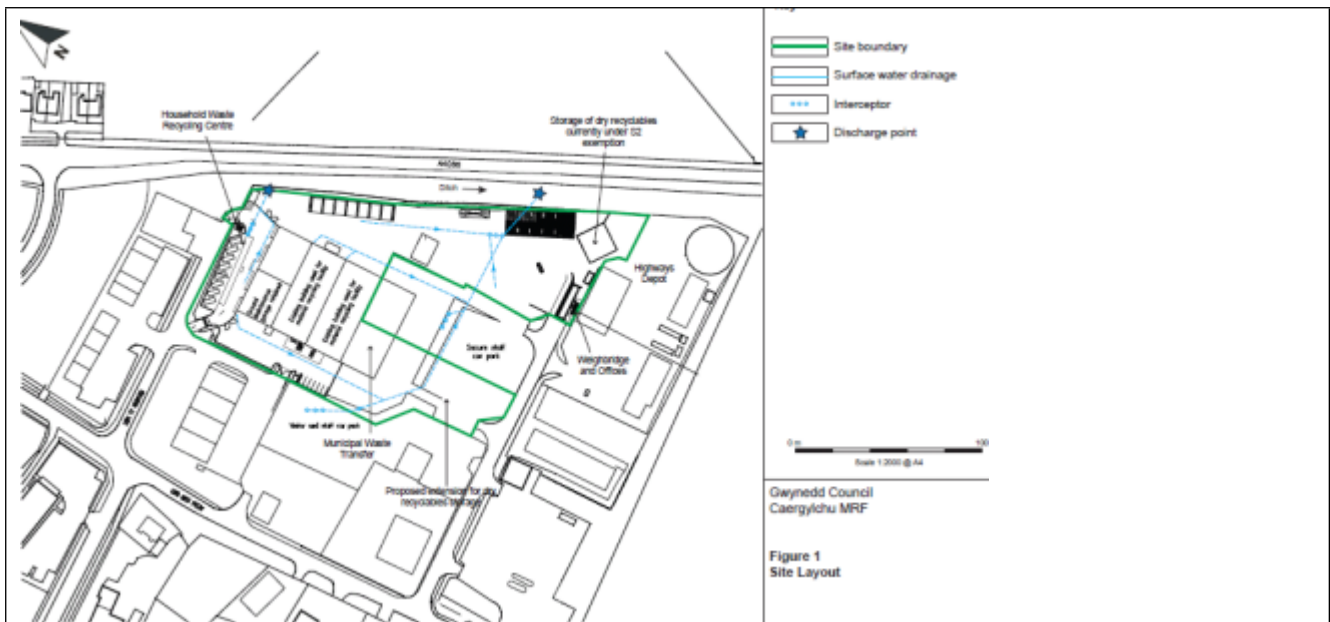


ACTION: Store and treat LoW 20 01 99 and LoW 20 03 01 as separate waste streams moving forward. The operator must stop and cease the blending of these waste streams moving forward.

W2D - The site

Permit condition 2.1.1 states: "*The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.*"

With reference to the below image, taken from schedule 7 of the site permit. The site's permitted boundary is outlined in green. It is understood that the operator is currently in the process of expanding the site boundary via a permit variation. Please note that prior to securing a permit variation, the activities must remain within the boundary currently displayed on the permit.



W2F - Technical requirements

Permit condition 2.4.1 states: "The storage (including temporary storage) and treatment of WEEE shall be carried out in accordance with the technical requirements of Annex III of the WEEE Directive."

With direct reference to Annex 3 of the WEEE (Waste electrical and electronic equipment) Directive as pictured below, Annex III outlines the categories of WEEE recognised by the directive. As a result, during the time of our visit no permit compliance issues were noted in relation to permit condition 2.4.1.

ANNEX III

CATEGORIES OF EEE COVERED BY THIS DIRECTIVE

1. Temperature exchange equipment
2. Screens, monitors, and equipment containing screens having a surface greater than 100 cm²
3. Lamps
4. Large equipment (any external dimension more than 50 cm) including, but not limited to:
Household appliances; IT and telecommunication equipment; consumer equipment; luminaires; equipment reproducing sound or images, musical equipment; electrical and electronic tools; toys, leisure and sports equipment; medical devices; monitoring and control instruments; automatic dispensers; equipment for the generation of electric currents. This category does not include equipment included in categories 1 to 3.
5. Small equipment (no external dimension more than 50 cm) including, but not limited to:
Household appliances; consumer equipment; luminaires; equipment reproducing sound or images, musical equipment; electrical and electronic tools; toys, leisure and sports equipment; medical devices; monitoring and control instruments; automatic dispensers; equipment for the generation of electric currents. This category does not include equipment included in categories 1 to 3 and 6.
6. Small IT and telecommunication equipment (no external dimension more than 50 cm)

During the time of our visit, NRW noted that WEEE such as fridge/freezers and other WEEE covered by Article III of the Directive, being stored on the civic amenity courtyard with no protection from the weather. Discussions were held as to the potential need to store WEEE waste under an impermeable covering/roof in future.



Sub-section 4.1 (*General waste storage*) of section 4 of the UK Government guidance: [*Waste electrical and electronic equipment \(WEEE\): appropriate measures for permitted facilities - 4. Waste storage, segregation and handling appropriate measures - Guidance - GOV.UK*](#) states: "15. You must use weatherproof covering to store any items that may be reused as whole appliances or may have components recovered from them for reuse. The type of covering will depend on the types and quantities of waste but must ensure the WEEE is protected from the weather."

The operator is encouraged to consider the installation and use of a weatherproof covering (such as an impermeable roof) in order to employ best practice as outlined in UK Government WEEE guidance.

W3C - Odour

During the time of the visit, no issues were noted in relation to odour.

W4D - Noise and vibration

During the time of the visit, no issues were noted in relation to noise and vibration.

W3F - Pests

During the time of the visit, no issues were noted in relation to pests. During the collection and removal of general waste from the site, staff could be seen visibly cleaning and removing waste which may give rise to pests in a prompt and professional manner.

W3G - Fire

It is noted that no condition requiring the site to have a Fire Prevention and Mitigation Plan (FPMP) is present within the site's permit.

W4B - Reporting

Materials Facility Sampling

As a Materials Facility, under the Environmental Permitting (England and Wales) Regulations 2016 as amended by the Environmental Permitting (England and Wales) (Amendment) Regulations 2023, paragraphs 7 (1) and 7 (2) of Schedule 9, the site is required to provide Material Facility sampling returns to NRW, within 1 month of the expiry of each quarter.

At the time of the visit the site had two overdue actions from Compliance Assessment Report (CAR): NRW0051204, being:

- Provide all missing Materials Facility sampling returns for Quarters: 2,3 ,4 of 2025 by 30 April 2026.
- Provide a copy of the site's Material Facility sampling methodology to NRW by the 31 May 2026.

During the visit, it was explained to myself and fellow NRW officers, that the operator has dedicated an area of the site (pictured below), which is intended to be used in order to meet the required Materials Facility sampling.



TCM Endaf Williams explained that the site is not currently undertaking the required testing, due to the type of baler the site uses raising health and safety concerns. TCM Endaf Williams raised the possibility of using third party Artificial Intelligence (AI) to meet

the Materials Facility sampling requirements. When asked when the site anticipates to begin Materials Facility sampling, TCM Endaf Williams gave an estimated date of around the end of March 2027 to the beginning of April 2027. As discussed on the visit, the operator is strongly encouraged to provide a sampling methodology as soon as possible to progress towards compliance with Materials Facility sampling requirements.

It is understood that NRW has a dedicated team who are dealing with Materials Facility sampling. Further matters regarding Materials Facility sampling will be dealt with by the relevant team, who will assess compliance on this requirement.

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Waste Returns

Permit condition 4.2.2 states: "*Within one month of the end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.*"

NRW have received the waste returns for the first quarter (Q1) of 2026 on the 24 April 2026.

Following review of the waste returns for Q1 and Q2 of 2026, the following was noted:

- "Bulky waste" has been accepted at the site under the LoW code of 20 03 01.
- Mattresses have been accepted at the site under the LoW code of 20 03 07.

With reference to *Technical Guidance WM3: Waste Classification - Guidance on the classification and assessment of waste*, the following is outlined:

- 20 03 01 is the LoW code for Mixed Municipal Waste.
- 20 03 07 is the LoW code for Bulky Waste

Please be aware that bulky waste (including mattresses) should be classified as LoW code 20 03 07 (Bulky Waste/Mattresses), and should not be classified as LoW 20 03 01 (mixed municipal waste).

Moving forward, the site is required to classify all bulky waste under the LoW code of 20 03 07.

ACTION: Classify Bulky Waste under the LoW code of 20 03 07 moving forward.

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Offensive hygiene waste and mixed municipal waste

Upon review of the *Waste Received* section of the waste returns submitted to NRW on 24 April 2026 (for Q1 2026), Nappies are clearly listed as LoW 20 01 99. However upon review of the *Waste Removed* section of the same waste returns both "Nappies" and the LoW code 20 01 99 are absent, as the nappies have been incorporated into the LoW code

20 03 01 when leaving site.

As previously outlined in section *W2A - Permitted Activities* of this CAR form, currently the site mixes kerbside collected offensive hygiene waste (LoW 20 01 99) into mixed municipal waste (LoW 20 03 01), with this waste leaving the site under the LoW code of 20 03 01. This practice distorts the accurate volumes of both 20 01 99 and 20 03 01 reportedly leaving the site on submitted waste returns.

Moving forward both LoW 20 01 99 and 20 03 01 must both leave the site and be reported leaving the site as such on waste returns moving forward.

ACTION: List LoW 20 01 99 under the correct waste code when leaving site on quarterly waste returns.

The above listed non-compliances are to be consolidated and scored as a C3 minor non-compliance against permit condition 4.2.2.

W4C - Notification

Permit condition 4.3.1 states: "*Natural Resources Wales shall be notified without delay following the detection of:*

(a) any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;

(b) the breach of a limit specified in the permit; or

(c) any significant adverse environmental effects."

During the visit, myself and fellow NRW officers were informed that the site's plastic baler had broken down on the morning of 8 June 2026 (the day of our visit).

The wording in permit condition 4.3.1 is: "*Natural Resources Wales shall be notified without delay*", as a result, I remind the operator to contact and notify NRW at the earliest possible opportunity, should similar issues (such as those outlined in permit condition 4.3.1) occur again.

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NRW would like to thank TCM Endaf Williams, Senior Site Officers: Kelvin Williams and Robin Evans for their time during the visit.

"In this document "Natural Resources Wales" means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (establishment) order."

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Please find below relevant links:

- NRW guidance on how to comply with your environmental permit:
 - [How to comply with your environmental permit](#)
- Service to change to, or vary a bespoke waste permit:
 - [Natural Resources Wales / Apply to change to, or vary, a bespoke waste permit](#)
- This document explains how we assess the compliance of permit holders:
 - [regulatory-guidance-note-5-operator-competence.pdf](#)
- NRW guidance on charging schemes and annual subsistence fees:
 - [Natural Resources Wales / Our charging schemes](#)
- NRW guidance on identification, classification, and management of waste containing POPs.
 - [Natural Resources Wales / Identify, classify and manage waste containing persistent organic pollutants \(POPs\)](#)
- NRW guidance on managing waste upholstered domestic seating containing POPs.
 - [Natural Resources Wales / Manage waste upholstered domestic seating containing persistent organic pollutants \(POPs\)](#)
- A link to the WEEE Directive:
 - [Directive - 2012/19 - EN - EUR-Lex](#)
- Technical Guidance WM3: Waste Classification - Guidance on the classification and assessment of waste:
 - [Waste_classification_technical_guidance_WM3.pdf](#)
- GOV.UK guidance, regarding appropriate measures for permitted facilities, relating to WEEE:
 - [Waste electrical and electronic equipment \(WEEE\): appropriate measures for permitted facilities - 4. Waste storage, segregation and handling appropriate measures - Guidance - GOV.UK](#)

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ENDS

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.