

Compliance Assessment Report CAR_NRW0052445

Permit being assessed: EP3198FW.

For: Neath And Port Talbot Hospital, **held by:** Kier Facilities Services Limited

At: Baglan Way, Port Talbot, SA12 7BX.

Type of assessment: Site Inspection,

Reason: Routine.

On: 23/06/2026 between 13:00 and 14:00.

Parts of permit assessed: Storage, segregation pre acceptance, waste acceptance.

NRW Lead Officer: Linda Warrick, accompanied by Matthew Davies.

Report sent to: Amanda Hayes, TCM, on 28/07/2026.

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	1.1.2

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	Update EMS to include flagging mechanism for sites requiring PAAs	28/08/2026
W1A	System to ensure actions are given dates and action are completed and closed within a set period of time after the PAA.	28/08/2026

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

The transfer station visit was audited as part of an NRW healthcare waste audit of Neath Port Talbot Hospital. The weather was sunny and hot. Amanda Hayes was accompanied by Kerry Thomas of NPT Hospital along with Richard Haycox and Iwan Norman of SBUHB.

Officers noted that the waste compound run by Kier was secure and signposted, displaying the permit number and emergency contact numbers. Amanda Hayes is the technically competent manager for the site.

Clinical waste carts

Officers undertook visual inspections in a number of clinical waste carts stored within the waste compound. The clinical waste carts were organised. On inspection they were locked and once opened it was established that they contained the correct waste type for their external tag.

Gypsum waste - this is now being segregated within the hospital. It is being placed in grey bags. This waste should be placed in designated gypsum boxes to ensure it is correctly treated at the next destination.

Each clinical cart was tagged with a coloured tag associated with that waste classification. Each bag within the carts were tagged however there is no system to track each bag to department of origin. This is key and is a requirement of **WHTM 07-01 and EPR 5.07**.

Officers were told that Natural UK are now removing all the clinical waste and conducting bin cleaning off site for the transfer station.

Clinical waste carts observed in the waste compound were:

- Anatomical red lidded bins 18 01 03
- Gypsum waste 18 01 04
- Orange lidded sharps bins 18 01 03
- Purple lidded sharps bins 18 01 03/18 01 08
- Yellow lidded sharps bins 18 01 03/18 01 09
- Tiger bags 18 01 04

- Orange bags 18 01 03

All Sharps bins were signed and dated. However it was sometimes unclear which department generated the bin with some labels just saying NPTH. Department names are required in future.

There were no blue pharmaceutical waste bins (18 01 09) stored in the compound. These are stored in the waste hold in the pharmacy department for extra security.

There is a well stocked spill kit. The site was well organised. Clearer markings for carts (empty and full) may provide clearer information for any new staff to ensure waste is segregated appropriately.

Documentation and records

Documents including training and Pre Acceptance Audits were reviewed on a follow up visit on the 16/07/2026 due to time constraints on the 23/06/2026.

Training

Kier have a good system in place for staff training. Amanda ran through this explaining that a training needs analysis is conducted and a list of safe systems of work has been established which employees must complete.

Non compliances are addressed via a system which Kier provides the hospital photographic evidence and the issue is e-mailed to the hospitals inbox.

The two main conditions which the site is scored against are Waste Acceptance and EMS.

1.1.1 Action

It was established that the EMS requires a flagging system to identify those PAA's that require yearly renewal and those that require renewal every 5 years.

1.1.2 Action

It was established that records need to be improved with regards to actions from PAAs being monitored and completed. A mechanism should be put in place to ensure these actions have been addressed by the hospital and this is fed back to the transfer station to ensure the loop is closed.

Action

A system should be introduced to identify departments of origin for each clinical waste bag.

End of report

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

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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.