

## Compliance Assessment Report CAR\_NRW0052521

**Permit being assessed:** TB3190HN.

**For:** Brecon Recycling Centre, **held by:** Bryson Recycling Limited

**At:** Unit 34, Ffrwdgrech Industrial Estate, Brecon, Powys, LD3 8LA.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 30/07/2026.

**Parts of permit assessed:** See criteria below.

**NRW Lead Officer:** Alder Tye, accompanied by Luke Taylor.

**Report sent to:** John Franks, Technically Competent Manager, on 30/07/2026.

### 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          | 1.1.2            |

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

| Total non-compliances recorded | Total non-compliance score |
|--------------------------------|----------------------------|
| 1                              | 4                          |

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      | 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. | 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**

This Compliance Assessment Report (CAR) has been issued following the expiry of the action deadline specified in Compliance Report CAR\_NRW0051708, dated 08/05/2026. As the required information has not been provided, NRW is unable to confirm that the site is receiving the minimum level of attendance from a Technically Competent Manager (TCM). Consequently, this breach has been repeated and rescored.

### W1A – General Management – Permit Condition 1.1.2 – Category 3 breach

Your permit states that you must operate activities using sufficient competent persons and resources, with condition 1.1.2 requiring that records to demonstrate compliance are maintained.

For Tier 2 permits, including Standard Rules permits, the minimum attendance requirement is for the Technically Competent Manager (TCM) to be present on site for at least 20% of the site's operational hours.

Failure to ensure adequate TCM attendance increases the risk of site activities being undertaken without sufficient technical oversight, which may lead to pollution or other permit non-compliances.

NRW officers are aware that the appointed TCM is responsible for multiple Household Waste Recycling Centre (HWRC) sites across Mid and North Wales, specifically four sites in Mid Wales. NRW understands that these circumstances remain unchanged since the previous assessment.

An email was sent to the TCM on 5 June 2026 as a reminder of the requirement of the completion of actions listed in Compliance Report CAR\_NRW0051708 (due by the end of 5 June 2026). A conversation was also had directly with the TCM during an inspection at another site run by the operator on 9 July 2026, where officers reinstated the requirements that actions outlined in the referenced Compliance Report were still outstanding, and that the actions should be completed at the earliest opportunity.

You have been scored a category 3 for the above permit breach as the action in Compliance Report CAR\_NRW0051708, dated 08/05/2026 to provide evidence of the minimum attendance time for the TCM to be present on site has not been provided to NRW.

**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 28 August 2026**

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](mailto: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](mailto: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.