Compliance Assessment Report CAR_NRW0052558

Permit being assessed: GP3692LQ.

For: RMR Recycling Ltd, **held by:** RMR Sand and Aggregates Limited

At: Pen-y-Fan Pond Lane, Manmoel Road, Manmoel, Blackwood, Caerphilly, NP12 0HY.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 03/08/2026.

Parts of permit assessed: See comments section.

NRW Lead Officer: David Thomson.

Report sent to: Redacted, Yard Manager, on 03/08/2026.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR4C - Installations - 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
0	0

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?

No action required.

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

Assessment Details

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (NRW) assessment of RMR Sand and Aggregates Ltd's (the operator) 6-monthly emissions to water reporting form for the period January to June 2026 against the relevant environmental permit conditions for reporting, emissions & monitoring and notifications.

Document submitted by the operator

Reference – RMR Sand Aggregates Q2 26.*pdf* (submission date – 22 July 2026)

Assessment Structure

Compliance Criteria (i.e., IR4B, IR3A and IR4C)

a. Permit Condition
b. Compliance Assessment
c. Consolidation of Non-Compliance Score
d. Root Cause Analysis (when applicable)

IR4B – Information – Reporting

(a) Permit Condition

Environmental permit condition 4.2.4 states:

> *Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency [sic], submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:*
>
> *(a) in respect of the parameters and emission points specified in schedule 4 table S4.1;*
>
> *(b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.2; and*
>
> *(c) giving the information from such results and assessments as may be required by the forms specified in those tables.*

Table S4.1 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.1 Reporting of monitoring data			
Parameter	**Emission or monitoring point/reference**	**Reporting period**	**Period begins**
Emissions to water Parameters as required by condition 3.1.1	W1	Every 6 months	1 January 1 July

Table S4.2 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.2 Reporting forms		
Media/parameter	**Reporting format**	**Date of form**
Water and Land	Form water 1 or other form as agreed in writing by the Environment Agency [sic]	

(b) Compliance Assessment

Point Source Emissions to Air – A1

Activity A1 in Table S1.1 of Schedule 1 of the environmental permit, which is responsible for generating air emissions, has not been, is not and is unlikely to be undertaken at the installation. Monitoring and reporting requirements in respect to this activity is withdrawn. Should the activity commence, monitoring and reporting requirements must be reinstated.

Point Source Emissions to Water – W1

1. The operator reported monitoring results for emissions to water by email on 22 July 2026 (reference: RMR Sand Aggregates Q2 26.*pdf*). This is within the 28-day reporting window, demonstrating compliance with the environmental permit.
2. The operator reported monitoring results using the *Water1* reporting form specified in Table S4.2 of Schedule 4, demonstrating compliance with the environmental permit.
3. The operator reported monitoring results for the reporting period specified in Table S4.1 of Schedule 4, demonstrating compliance with the environmental permit.
4. The operator reported monitoring results for all parameters and emission points specified in Table S4.1 of Schedule 4, demonstrating compliance with the environmental permit.

Compliance Classification Scheme (CCS): *There are no incidents of non-compliance with permit condition 4.2.4.*

Justification*: NA*

Action*: No action required.*

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

(d) Root Cause Analysis

NA

IR3A(1) – Emissions and Monitoring – Emissions to Water

(a) Permit Condition

Environmental permit condition 3.1.2 states:

The limits given in schedule 3 shall not be exceeded.

Table S3.2 of Schedule 3 to the environmental permit is reproduced below.

Table S3.2 Point source emissions to water (other than sewer) – emission limits and monitoring requirements

Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
W1 onsite plan schedule 7 emissions to Sirnhowy tertiary tributary watercourse	Total suspended solids	Surface water from bypass interceptor	50ml/L	Instantaneous	6 Months	In accordance with M18 guidance
	Oils and grease	Bypass interceptor	No visible oil or grease	Instantaneous	Weekly	Visual examination of discharge

Table S3.3 of Schedule 3 to the environmental permit is reproduced below.

Table S3.3 Surface water or groundwater monitoring requirements				
Location or description of point of measurement	**Parameter**	**Monitoring frequency**	**Monitoring standard or method**	**Other specifications**
W1 onsite plan schedule 7 emissions to Sirnhowy tertiary tributary watercourse	Copper Iron Leas Zinc	6 monthly	In accordance with M18 guidance	
	Ammoniacal Nitrogen	6 monthly	In accordance with M18 guidance	

(b) Compliance Assessment

Point Source Emissions to Water – W1

All monitored parameters for emissions to water were within the emission limits specified in Table S3.2 and S3.3, demonstrating compliance with the environmental permit

***Compliance Classification Scheme (CCS)**: There are no incidents of non-compliance with permit condition 3.1.2*

***Justification**: NA*

***Action**: No action required*

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

(d) Root Cause Analysis

NA

IR4C – Information – Notification

(a) Permit Condition

Environmental permit condition 4.3.1(b) states:

The Environmental Agency shall be notified without delay following the detection of:

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

Furthermore, condition 4.3.2 of the environmental permit states:

Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

(b) Compliance Assessment

Point Source Emissions to Water – W1

The operator did not exceed any parameter limits specified in Tables S3.2 or S3.3 of Schedule 3. Consequently the operator was not required to submit a Schedule 5 notification to NRW, demonstrating compliance with the environmental permit.

***Compliance Classification Scheme (CCS)**: There are no incidents of non-compliance with permit conditions 4.3.1(b) and 4.3.2.*

***Justification**: NA*

***Action**: No action required*

(c) Consolidation of Non-Compliance Scores
Consolidation of CCS scores is not required.

(**d) Root Cause Analysis**
NA

[END]

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 Industry compliance criteria (used in section 1 and 2):

1. Management
- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations
- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring
- IR3A(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information
- IR4A – Records
- IR4B – Reporting
- IR4C – 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.