Compliance Assessment Report CAR_NRW0052549

Permit being assessed: WP3836ZF.

For: Wrexham Clinical Waste Treatment Facility (Incinerator), **held by:** Tradebe Healthcare National Limited

At: Wrexham Clinical Waste Treatment Facility (Incinerator) Marlborough Road , Wrexham Industrial Estate, WREXHAM, Clwyd, LL13 9RJ.

Type of assessment: Audit,

Reason: Other.

On: 10/06/2026 between 10:47 and 12:51.

Parts of permit assessed: See below.

NRW Lead Officer: Ricky Hartleb, accompanied by Kathryn Bradshaw.

Report sent to: SHEQ Officer, SHEQ Officer, on 05/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR4A - Installations - Information - Records	C3 Minor	4.1

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
IR1A	See Actions	01/11/2026
IR4A	See Actions	01/11/2026

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 audit was undertaken as a follow up to the previous NRW Hazardous Waste Audit completed 18 June 2024. The audit reviewed the actions taken in response to previous findings relating to waste tracking and records management, together with a review of waste acceptance, pre-acceptance, quarantine management and reporting arrangements.

Officers met with the Site Manager, Plant Manager, SHEQ Lead and SHEQ Officer. During the audit, we spoke with several members of staff, including a plant operative.

Improvements were identified in several areas, particularly in relation to the availability of waste tracking information, however, a number of management and records deficiencies remain which are detailed below.

Waste Tracking / SAP

Sampled consignments were traced through from producer to receipt / acceptance and subsequent management at the site. Consignment documentation and SAP-derived tracking information were available and generally consistent. Previous concerns regarding inability to retrieve waste tracking information appear substantially addressed. This represents a significant improvement since the previous audit.

Following the audit, the Operator provided revised tracking information and confirmed that several records identified as "unable to locate" do not have full traceability available. Specifically, the operator confirmed that they do not have full traceability for:

- BRADWE/000G9
- CT25793 (linked to SALFOR/000QJ)
- CT33531 (linked to WHISTO/TR1POM)
- CT17100

Whilst the majority of sampled consignments were successfully traced through acceptance and subsequent management, the inability to provide full traceability for these records indicates that complete waste tracking cannot currently be demonstrated for all containers accepted and managed at the facility.

Several disposal dates identified as November/December 2026 during the audit were confirmed by the Operator as data entry errors. Revised records were subsequently provided showing the correct dates. No further action is required in relation to these entries.

This has been scored a Category 3 breach of Condition 4.1 IR4A Records and a Category 3 breach of Condition 1.1.1 IR1A General Management as the inability to demonstrate complete traceability for a number of sampled records indicates shortcomings in both record keeping and management systems intended to ensure waste movements can be fully tracked.

Action 1: Investigate the records where full traceability history cannot be demonstrated and identify the root cause of the missing information and report the findings to NRW by 01/11/2026.

Action 2: Review waste tracking arrangements to ensure complete traceability can be demonstrated for all wastes accepted to site.

Action 3: Implement measures to prevent recurrence. NRW may undertake a future audit or inspection to verify that appropriate improvement measures have been implemented.

Pre-Acceptance Assessments (PAA)

Whilst examples of good practice were identified, particularly within the Christie NHS Foundation Trust assessment, there were also instances of assessments being accepted despite not meeting the requirement of NRW Appropriate Measures guidance.

Further information on this guidance can be found here:

https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities/waste-pre-acceptance-acceptance-and-tracking-appropriate-measures

Smallthorne Health Centre

The information reviewed does not meet the requirements of a compliant pre-acceptance assessment.

Only basic information is provided regarding the producer, waste generated and containers used. Several elements required by the guidance are not addressed.

The assessment also states that the producer does not generate pharmaceutical waste (blue bin waste), which appears unusual for this type of premises and raises questions regarding the completeness of the assessment.

Blackpool

This assessment is largely compliant and overall has been completed to a good standard.

However, several deficiencies remain:

- No information on where waste streams not sent to Tradebe are managed.
- No quantities recorded for individual waste streams. These are simply recorded as "held by contractor".
- Container and storage information lacks detail regarding packaging type and colour coding.
- Limited evidence of questioning of staff during the audit process.
- No evidence of follow-up against actions from the previous assessment.

Christie NHS Foundation Trust

This assessment is largely compliant and demonstrates improvement compared with the previous assessment by NRW.

It is positive to see hazardous properties now linked to individual waste streams.

However, the assessment remains incomplete in some areas:

- No consideration of suitability for acceptance at licensed recovery/disposal facilities.
- No evidence of staff interviews or questioning.
- No documented follow-up against previous audit actions.

Point 19 of the Appropriate Measures guidance states:

"If the audit report is partially incomplete or inadequate, because it does not meet all the requirements set out in appropriate measures 1 to 18, you must request the missing information (or another audit report). You must assess this before you accept the waste."

The assessments reviewed demonstrate varying standards of completion. Several reports did not fully meet the guidance requirements. During the audit, it was not clear how the operator ensures incomplete assessments are identified, reviewed and completed before waste acceptance.

This has been scored a Category 3 breach of Condition 1.1.1 IR1A General Management (Consolidated).

Action 4: Review arrangements for assessing and approving pre-acceptance audits to ensure reports meeting only part of the Appropriate Measures requirements are not accepted without obtaining and assessing the missing information.

Waste Rejections & Quarantine

A review of waste rejection and quarantine records identified several entries where no date of removal from the quarantine area had been recorded.

During the subsequent inspection of the quarantine area no waste containers were present. This indicates that records were not being consistently updated to reflect the current status and location of quarantined waste.

Whilst no inappropriate storage of waste was identified, the records reviewed did not provide an accurate and complete audit trail demonstrating the management of quarantined waste, what had happened to the waste or where and when it had been disposed of.

This has been scored a Category 3 breach of Condition 4.1 IR4A Records (Consolidated) and a Category 3 breach of Condition 1.1.1 IR1A General Management (Consolidated).

Action 5: Review quarantine record procedures to ensure records accurately reflect the status and location of all quarantined wastes, including removal dates and final management outcome.

Hazardous Waste Returns vs Waste Returns

Following the audit, the Operator advised NRW that Operator Returns include non-hazardous wastes accepted under the permit whereas hazardous waste returns are based on hazardous waste consignments only. The Operator advised that increasing quantities of non-hazardous pharmaceutical waste account for some of the differences between the two datasets. However, no reconciliation was provided demonstrating how the reported figures relate to one another or to source records.

A comparison was undertaken between Hazardous Waste Returns and Waste Returns for 2025. The review identified some differences between the two reporting systems, however annual totals indicate an overall variance of 1.19%, which indicates a high degree of consistency despite some higher variance within the individual low volume waste streams.

2025 Total

EWC	Hazardous Waste Return (t)	Waste Return (t)	Variance (%)
15 02 02*	0.30	0.84	94.73%
16 03 03*	1.22	1.22	0%
16 03 05*	0.83	0.83	0%
18 01 03*	3459.17	3437.39	0.63%

18 01 08*	441.57	423.01	4.29%
18 02 02*	46.11	38.95	16.83%
18 02 07*	1.33	1.37	2.96%
Total	3950.55	3903.61	1.19%

Treatment Residues

NRW queried the reporting of EWC 19 01 07*, 19 01 11* and 19 01 13* within the 2025 Waste Returns.

The Operator confirmed that use of EWC 19 01 07* within the Q1 2025 Waste Return resulted from an administrative error and subsequently submitted a corrected Q1 2025 Waste Return. The Operator also confirmed that:

- IBA is classified and reported as EWC 19 01 11*
- APC is classified and reported as EWC 19 01 13*
- IBA and APC residues are not mixed at any stage of handling, storage, transport or disposal
- IBA and APC residues are reported separately within the Waste Returns

The operator confirmed that IBA is sent to Veolia Whitemoss, Lancashire, whilst APC is sent either to Tradebe Gwent, or Castle Environmental, Derbyshire.

No further action is required in relation to the residues, and the above is provided for information only.

Summary

This audit was undertaken as a follow up to the previous NRW audit completed in 2024.

Significant improvements were identified in relation to the availability of waste tracking information, and the Operator was generally able to demonstrate the movement of sampled consignments.

However, deficiencies remain in relation to waste traceability, pre-acceptance assessment arrangements and quarantine records. These indicate weaknesses in both management systems and record keeping arrangements.

The Operator advised that a dedicated Waste Auditor role was due to be implemented from July 2026. NRW notes that this may assist the Operator in addressing the findings identified during the audit.

As a result, consolidated scores have been applied against:

- Category 3 score against Condition 1.1.1 IR1A General Management
- Category 3 score against Condition 4.1 IR4A Records

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.