

## Compliance Assessment Report CAR\_NRW0052155

**Permit being assessed:** UP3794FZ.

**For:** Worldcare Wales Ltd, **held by:** World Care (wales) Ltd

**At:** Worldcare Wales Ltd, Llandudno Junction, Conwy, LL31 9PN.

**Type of assessment:** Report/Data Review,

**Reason:** Routine.

**On:** 19/06/2026.

**Parts of permit assessed:** As below. .

**NRW Lead Officer:** Cheryl Griffiths.

**Report sent to:** Lee Jones., Director., on 14/08/2026.

### 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)   |                  |
| W3G - Waste - Emissions and monitoring - Fire             | Action only (X)   |                  |
| W3G - Waste - Emissions and monitoring - Fire             | Action only (X)   |                  |

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?

| Criteria | Action needed                                                                                                                                                                      | Complete by |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| W1A      | Ensure compliance going forward with the waste storage procedures and limits specified within the Environmental Management System.                                                 | 31/08/2026  |
| W3G      | Ensure that all combustible waste stockpiles remain within the 4-metre height limit specified in the current FMP. Stockpiles exceeding this limit may be recorded by NRW as a non- | 31/08/2026  |

| Criteria | Action needed                                                                                                                                                                                                                                            | Complete by |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
|          | compliance with the FPMP and environmental permit.                                                                                                                                                                                                       |             |
| W3G      | Review and update the FPMP to strengthen the areas identified, providing additional information where required and sufficient detail to demonstrate that the relevant fire prevention measures can be effectively implemented, monitored and maintained. | 31/08/2026  |

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.

#### **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

Following the site inspection undertaken on 12 September 2025, a Compliance Assessment Report (CAR reference CAR\_NRW0049834) was issued to the operator. The report identified a number of actions requiring completion, including the development and implementation of updated procedures within the site's Environmental Management System (EMS) and Fire Prevention and Mitigation Plan (FPMP).

The revised FPMP was submitted to Natural Resources Wales (NRW) on 25 March 2026, with the updated EMS subsequently submitted on 31 March 2026.

Following a review of both documents, NRW has identified several areas where further development and clarification are required. These are outlined in the sections below.

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#### **W1A – General management**

**Permit Condition 1.1.6 states: *The operator shall manage and operate the activities:***

***(a) 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.***

Following our review, NRW observed that the operator has addressed the actions specified within the previous CAR report (CAR\_NRW0049834), relating to the development and implementation of a waste storage management procedure within the site Environmental Management System (EMS).

Review of the updated EMS (EMS-WCW-102 Rev 01, January 2026) and associated Standard Operating Procedures demonstrates that waste storage management

requirements have been incorporated into the management system. The EMS now includes a First In, First Out (FIFO) stock rotation procedure for combustible wastes, with storage duration controls specifying that combustible waste should not generally be stored for longer than six months, unless a shorter period is required by the environmental permit.

The EMS also includes defined stack dimension limits, specifying that waste materials shall be stored in stacks not exceeding a maximum height of 4 metres, or 1 metre below the highest wall up to 4 metres, unless otherwise permitted.

In addition, the EMS contains a table detailing maximum storage capacities for individual storage bays, providing clear operational limits intended to minimise environmental risks and reduce the potential for fire.

Overall, the updated EMS demonstrates that the operator has implemented documented controls for waste storage duration, stock rotation, stack dimensions and storage capacities, in line with the requirements of the previous CAR action.

***Action: The operator shall continue to implement and maintain compliance with the waste storage procedures defined within the Environmental Management System, including storage duration limits, storage maximum capacities and stack dimension requirements, to ensure waste is managed appropriately and the risk of pollution and fire is minimised.***

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## **W3G – Fire**

**Permit Condition 5.7.1 states: *The operator shall manage and operate the activities in accordance with a written Fire Prevention and Mitigation Plan, using current and relevant fire prevention plan guidance.***

The following is structured to address each of the matters NRW previously raised with the operator. Each topic is highlighted below by following NRW's current Fire Prevention and Mitigation Plan (FPMP) guidance: [Natural Resources Wales / Fire prevention and mitigation plans](#)

An electronic copy of the most recent Fire Prevention Management Plan (FPMP) (WCW-01-101 rev 01) was sent to NRW via email on Wednesday 25 March 2026 which have been reviewed.

It should also be noted that that where information was not requested from the operator, no assessment has been carried out against those criteria. Where a matter has not been assessed as part of this review, it may be assessed in the future if required.

### **Stack size and separation distances**

The operator was requested to ensure that waste stockpiles on site always remains within the permitted height and volume limits as specified in the FPMP.

Within the most recent FPMP, the operator has increase the maximum stockpile height from 3 metres to 4 metres. This is in line with the maximum stockpile height permitted

within the relevant guidance.

**Action: The operator must ensure that all combustible waste stockpiles remain within the maximum height limit of 4 metres specified in the current FPMP. Appropriate management and monitoring arrangements must be maintained to ensure ongoing compliance. Any stockpiles found by NRW to exceed this limit during future inspections will be considered a non-compliance with the FPMP and the environmental permit.**

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### **Enclosing stacks using bays and fire walls**

The operator was requested to establish separation distances between stockpiles and incorporate these arrangements into the FPMP procedures.

A review of the most recent FPMP indicates that the operator has not adopted separation distances between stockpiles, but has instead installed fire walls between waste storage stacks.

NRW's current FPMP guidance recognises fire walls as an alternative control measure, stating that *"you can reduce the need for separation distances if you use bays or fire walls between waste storage stacks."* The updated FPMP reflects this approach and documents the use of fire walls as the site's selected fire prevention measure.

NRW considers that the FPMP requires further development, strengthening, and the provision of additional information in the following areas;

- The construction of the walls in terms of how they offer a thermal barrier and enable cooling.

The FPMP should provide further detail on the construction of the walls used to separate stockpiles, specifically how they act as a thermal barrier and assist with cooling in the event of a fire. The plan should explain the materials and design of the walls and how these contribute to preventing heat transfer between stockpiles.

- How stock capacity will be managed and controlled (using first in, first out concept)

The FPMP should clearly explain how stock capacity will be managed and controlled, including the use of a first in, first out (FIFO) approach to ensure waste is regularly moved off site. The plan should set out the controls, monitoring arrangements and records that will be used to demonstrate that stockpile volumes remain within approved limits and that waste is not stored for longer than intended.

- Prevention of bridging across or around walls.

The FPMP should clearly explain the measures in place to prevent waste from bridging across or around bay walls, which could allow a fire to spread between adjacent stockpiles. The plan should describe the operational controls that will be used to maintain the integrity of the separation distances and ensure that waste is not stored above, against or around the walls in a way that compromises their effectiveness.

- How a 'freeboard' space of 1m at the top and sides of the walls will be physically retained at all times in accordance with the latest available guidance

The FPMP should clearly explain how a minimum 1 metre freeboard will be maintained at the top and sides of all bay walls at all times, in accordance with current guidance. The plan should describe the operational controls, monitoring arrangements and inspections that will be used to ensure waste does not exceed the permitted storage height or encroach into the freeboard space.

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The guidance also states *"the bays and fire walls must be of sufficient height, thickness and construction that offer a fire resistance period of at least 120 minutes to allow waste to be isolated to stop fire spreading and minimise radiant heat"*.

The FPMP does not include sufficient information to demonstrate that the storage bays and fire walls are of adequate height, thickness and construction to provide a minimum fire resistance period of 120 minutes. This information is required to demonstrate that waste can be effectively isolated in the event of a fire, preventing fire spread and minimising the effects of radiant heat on adjacent waste stacks and site infrastructure.

The FPMP does not demonstrate that the bays and fire walls meet the required fire resistance standards, or that they have been installed in accordance with the manufacturer's specifications. It also does not explain how compliance with the relevant guidance and evidence requirements will be demonstrated. The FPMP should be updated accordingly.

NRW officers have also undertaken site visits, and observed that fire walls have been installed between waste storage areas. These observations are consistent with the approach described within the updated FPMP. However, whilst the presence of the fire walls on site has been verified, the FPMP does not currently provide sufficient information or supporting evidence to demonstrate that they meet the design and fire resistance requirements set out within the NRW FPMP guidance.

**Action: Review and update the FPMP to strengthen the areas identified above, providing additional information where required and sufficient detail to demonstrate that the relevant fire prevention measures can be effectively implemented, monitored and maintained.**

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NRW would like to take this opportunity to thank you for your cooperation throughout our active monitoring and review of the site's Environmental Management System (EMS) and Fire Prevention and Mitigation Plan (FPMP). The actions identified within this report must be addressed to ensure that both the EMS and FPMP are compliant with the relevant permit requirements and applicable guidance. Please ensure that all actions are completed and reflected within updated versions of the relevant documents, which should then be submitted to NRW for review.

Any compliance criteria not highlighted within the above summary should be considered as

not assessed.

*"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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\*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](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.