Compliance Assessment Report CAR_NRW0052806

Permit being assessed: CB3495FF.

For: Kings Dock, **held by:** South West Wood Products Limited

At: Swansea, Swansea, Swansea, SA1 8QT.

Type of assessment: Site Inspection,

Reason: Routine.

On: 27/08/2026 between 10:20 and 11:20.

Parts of permit assessed: W1A, W2C, W2D, W3B, W4A.

NRW Lead Officer: Alex Underhill.

Report sent to: Rita Vassallo, TCM, on 03/09/2026.

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	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.1.1
W4A - Waste - Information - Records	Action only (X)	

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
W3B	The Operator is to undertake a comprehensive review of its Dust and Emissions Management Plan to ensure its	20/10/2026

Criteria	Action needed	Complete by
	continued compliance with permit condition 3.1.1 of Environmental Permit EPR-CB3495FF. This review must be completed in accordance with recognised industry standards, including the Environment Agency's Appropriate Measures for Non-Hazardous and Inert Waste Facilities and relevant Best Available Techniques (BAT) guidance for the waste treatment sector.	
W4A	Ensure that all relevant documentation including the EMS, FPMP and DEMP, are amended to reflect the new ways of working.	20/10/2026

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

Purpose of inspection:
This was an announced site visit made by Alex Underhill, accompanied by Dave Ellar of Natural Resources Wales (NRW). The purpose of the inspection was to assess compliance against the Standard Rules SR2011 No4 Environmental Permit EPR-CB3495FF.
The weather was noted to be cloudy, with heavy rain falling recently.

Previous inspection:
No permit breaches were observed during the last inspection dated 30/06/2026. Please see Compliance Assessment Report CAR_NRW0052226 for further detail.

Permit Breaches:
Emissions of substances not controlled by emission limits (W3B):-
Category 3 Breach (Minor)
A Category 3 (minor) permit breach against W3B (Emissions of substances not controlled by emission limits) and condition 3.1.1 of the permit was identified during this inspection.

Permit condition 3.1.1 states:
Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

Permit condition 3.1.2 states:
The operator shall
(a) if notified by Natural Resources Wales that the activities are giving rise to pollution, submit to

Natural Resources Wales for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
(b) Implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

Evidence gathered through received complaints has identified the site has not been effectively preventing the emissions of dust from the site. Whilst the site is taking all actions from the existing Dust and Emissions Management Plan (DEMP), this evidence suggests that the existing actions may not be appropriate to control emission limits and therefore contrary to section 3.1.1.
Section 3.1.2 states that when notified by NRW that activities are giving rise to pollution, the operator shall submit an emissions management plan to identify and minimise the risks of pollution from emissions. An Emissions Management Plan is to be created, showing consideration for methods of dust management in accordance with recognised industry standards and relevant Best Available Techniques (BAT) guidance for the waste treatment sector.

General observations:
The site was generally very clean and well organised, with good segregation of waste types and good waste storage practices were observed. Stockpiles had increased since the last inspection due to customer shutdowns, however this is only temporary, and stock levels are expected to be reduced following outgoing shipments.

General Management (W1A):
The site is required to be operated in accordance with a written management system that identifies and minimises risks of pollution. The Environmental Management System (EMS) is currently not accurate to the working practices as a result of recent changes made to operations to prevent dust emissions. This was assessing during the last inspection, and these changes are seen as improvements and after assessment by the inspecting Officers, pose no increased risk. The relevant documentation is in the process of being amended to reflect these changes, the action deadline for this is 20/10/2026.

Operating Techniques (W2C):
Recent changes had been made to both the operating techniques and the site layout to improve both dust management and operational efficiency, and these were still being followed during the time of inspection. Site storage has been changed from linear rows to a cove shaped layout to contain dust during processing. Staff training, personnel changes and investment in machinery have been implemented to significantly reduce the dust emissions leaving site.

The Site (W2D):
All specified waste sections were kept separate and site was well maintained. The site itself in well maintained and clean, with recent improvements done to the drainage and impermeable surfaces. There are plans to resurface the existing concrete surface to aid in removing surface water and drain away to water tanks installed in the corner of the site.

Emissions of substances not controlled by emission limits (W3B):
Recent changes have been made to reduce and prevent the emission of dust during operations. Water cannons and bowsers were in place. The new storage and processing layout was in place. Soaking of material before processing was not taking place as piles were already wet from recent rain. Visual monitoring and wind monitoring were taking place, and Regulation officer was happy that the Dust and Emissions Management Plan (DEMP) was being followed.
However, there have been several dust complaints received from neighbouring sites, and whilst the

site is compliant with the existing DEMP, NRW considers that the current DEMP is not adequately controlling dust emissions and requires review and improvement to ensure compliance with Environmental Permit EPR- CB3495FF. **This has been recorded as a category 3 breach (minor) of permit condition 3.1.1**

ACTION – The Operator is to undertake a comprehensive review of its Dust and Emissions Management Plan to ensure its continued compliance with permit condition 3.1.1 of Environmental Permit EPR-CB3495FF. This review must be completed in accordance with recognised industry standards, including the Environment Agency's *Appropriate Measures for Non-Hazardous and Inert Waste Facilities* and relevant Best Available Techniques (BAT) guidance for the waste treatment sector. The deadline for submission of the revised Dust Management Plan is 20th October 2026. This is in line with the existing documentation review for the EMS and FPMP.

Records (W4A):
Up to date EMS and Site Permit were readily accessible on site. Due to recent improvements to the site's operating procedures and setup, the EMS, Fire Prevention and Mitigation Plan (FPMP) and DEMP do not reflect the current process and are therefore non-compliant. However, these changes are seen as improvements and after assessment by the inspecting Officers, pose no increased risk. Documentation needs to be amended to reflect these changes.

ONGOING ACTION – Ensure that all relevant documentation including the EMS, FPMP and DEMP, are amended to reflect the new ways of working. This is expected to be completed by 20/10/2026.

Many thanks for your time during the inspection.

Ends.

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 2012.

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.