

Compliance Assessment Report CAR_NRW0052923

Permit being assessed: PP3739BK.

For: Unit 11, **held by:** Shield Environmental Services Limited

At: Unit 11, Martin Road, Tremorfa Industrial Estate, Tremorfa, Cardiff, Cardiff, CF24 5SD.

Type of assessment: Audit,

Reason: Routine.

On: 10/09/2026 between 10:00 and 11:30.

Parts of permit assessed: IR2C.

NRW Lead Officer: Brigid Armstead.

Report sent to: Shield Environmental, Shield Environmental, on 11/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2C - Installations - Operations - Operating techniques	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

Waste transfer note and TCM audit report

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Martin Road Hazardous Waste Transfer Station

Shield Environmental Services Limited

Date of Audit: 10/09/2026

EPR Permit: PP3739BK

Introduction

A site visit by Natural Resources Wales (NRW) to Martin Road Hazardous Waste Transfer Station (Shield) was carried out on 10th September 2026 to complete an audit of waste transfer notes and technically competent manager (TCM) compliance. Prior to the visit, NRW requested copies of the consignment notes from Quarter 1 2026 for review.

Our purpose was to review the company's compliance with their EPR Permit and environmental legislation and where appropriate to provide advice and guidance to assist in identifying and delivering improvements.

Audit Findings

Environmental Management System

Shield maintains a BS EN 14001 accredited Environmental Management System (EMS) as audited by NRW in 2025. The EMS includes a Waste Transfer Procedure Manual which details the site operations including waste acceptance, dispatch, waste returns, spillage and emergency procedure.

Incoming Waste

The consignment note procedure is set out in the Hazardous Waste (Wales) Regulations 2005 as amended and must be followed by all parties in the waste movement.

At the time of audit, Shield only accepted waste from their own activities. Construction waste generated from sites is not permitted to be returned to the permitted site unless it falls within the approved asbestos waste streams.

Waste is delivered by licenced waste carriers who must report to reception and sign in. Staff check the hazardous waste consignment notes to confirm consignment details, waste description and carrier credentials. Waste is subject to a visual inspection before unloading. Waste is rejected if it does not meet the permitted waste type or it is not packaged correctly in accordance with the hazardous waste regulations. Incoming waste consignment notes are then filled out by Shield staff receiving the waste.

Waste consignment notes for Q1 2026 were requested prior to the site visit, these were

received by NRW and reviewed. Consignment notes were suitably filled out and contained all of the relevant information. The waste consignment notes reviewed comply with the EWC code requirements of their permit.

Shield are recorded on the incoming consignment notes as the waste producer and in some cases the waste quantity exceeds 500kg.

Advisory: As Shield produce waste in excess of 500kg, they have an obligation to register as a hazardous waste producer. This can be done by use of the following [link](#), which has more detailed guidance.

Outgoing Waste

A documented procedure is in place for ensuring that only appropriate authorised facilities and licenced waste carriers are utilised in waste removal.

A selection of Outgoing waste consignment notes were reviewed during the site visit. Consignment notes were suitably filled out and contained all of the relevant information.

Technically Competent Manager

During the site visit, the Technically Competent Manager (TCM) provided their primary WAMITAB certification as well as refresher certificates to show up to date certification of competence.

The TCM is on site during waste acceptance hours and when on leave, this responsibility is covered by the Stores Manager who is trained in waste management. Both the TCM and the stores manager were able to demonstrate knowledge of waste management procedures, permit requirements and incident response capability.

A training matrix is maintained for the TCM which includes consignment notes, but no record of training in completing consignment notes was maintained for the Stores Manager .

Advisory: Ensure that a record of training in waste management is maintained for all personnel with relevant responsibilities.

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.