Compliance Assessment Report CAR_NRW0052907

Permit being assessed: DB3231RX.

For: Natural U K Ltd Healthcare Management Facility, **held by:** Natural U K Ltd

At: Unit 3, Capel Hendre Industrial Estate, Capel Hendre, Ammanford, Carmarthenshire, SA18 3SJ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 03/09/2026 between 10:30 and 12:30.

Parts of permit assessed: Annual report, OMP and operations.

NRW Lead Officer: Linda Warrick.

Report sent to: Rhiannon Chapple, SHE Manager, on 17/09/2026.

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)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	C3 Minor	3.2.2

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
W3C	Review Odour sources, re-site adult nappy screening, cover	15/12/2026

Criteria	Action needed	Complete by
	screened waste awaiting offsite disposal, look at sealing shutter doors on side of the building	

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

The site was visited as part of a routine inspection. The weather was overcast but dry during the visit. The site comprises of four main activity areas:

- Ecosteryl disinfection unit for infectious clinical waste
- Waste transfer storage for clinical waste
- Nappicycle for the processing of childrens nappies
- Adult nappy shredding and storage for onward disposal

The site has two members of staff with the HWROC6 qualification which is appropriate for this permit.

This Compliance Assessment Report (CAR) acknowledges the receipt of the annual monitoring report required by EPR 5.07 and Table S1.2 of the permit DB3231RX.

Ecosteryl Disinfection Unit
It is confirmed that NRW received the report on the 21st of July 2026. It meets the requirements within EPR 5.07 and 100% of the spores tested have met STATT Level IV (6 log10 reduction, 99.999 reduction).

The permitted site area must continue to be managed and operated in accordance with the conditions of the environmental permit.

Routine efficacy monitoring is completed every 2 months, using Bacillus Atrophaeus spore strips with a D factor of a minimum of 1.8. The spore strips are placed within the spore carrier and processed through three waste cycles at around 100 degrees centigrade for a minimum of 1 hour. These are then collected at the end of the run and sent to an accredited laboratory for testing to ensure sterilisation is reached.

Bioaerosol monitoring was also completed as part of the annual report. The results show that tracer spores were not detected during the active air monitoring with a Casella Slit Sampler. The results show that the plant is compliant with the emission limits and is safe to

operate with no significant bioaerosol emissions present.

The plant will undergo recommisioning in July 2027.

Clinical Waste Transfer storage area
The carts in this area were clearly tagged. These were inspected and contained the correct waste types. The quarantine had items in it that staff were uncertain of and would be reviewed by the TCM. This is good practice. Pre Acceptance Audits were discussed from the producers of the healthcare waste transferred to the permitted site and NUK have forwarded an assortment of these for NRW to review.

Nappicycle Process Odour Management Plan
NUK have an OMP which they have recently reviewed due to the extreme hot weather. Due to some recent odour complaints the site have identified the effluent tanks as a possible odour source and the contents now pass through activated carbon drums to reduce the risk of odours during transfer operations.

Processing and storage of the Adult Hygiene Products
During the walk through some areas of the site were identified as potential sources of odour including the RoRo storing the processed Adult absorbent hygiene products (AHPs) and the temporary shredding process for the Adult AHPs. These are being reviewed with a relocation into a fully enclosed building planned in the next few months for the shredding operation itself. A cover will be placed on the RoRo and the use of a deodorising spray will be explored. This container is removed at the end of every working day. The final source was identified as potentially coming from the shuttered area on the side of the building storing the Nappies awaiting processing in the Nappicycle process. A possibility of sealing this is being reviewed.

Action: Please provide an update of the OMP within one month of receiving this report.

Nappicycle End of Waste
There are a number of outstanding documents and information requested by NRW regarding the End of Waste status of the material leaving the site from this process.
Action: This information is required to be **submitted for review by NRW by the 15th of December 2026.**

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.