

Compliance Assessment Report CAR_NRW0052965

Permit being assessed: CB3398ZF.

For: Forward Waste Management East Moors Road Hazardous Waste Transfer Station,
held by: Forward Waste Management Ltd

At: 122-128 East Moors Road, Cardiff, CF24 5EE.

Type of assessment: Site Inspection,

Reason: Routine.

On: 16/09/2026 between 10:00 and 11:00.

Parts of permit assessed: 1.1.4, 2.3.1(a), 2.1.1, 2.2.1, 4.2.5 .

NRW Lead Officer: Dale Padfield.

Report sent to: ~, SHEQ Manager, on 16/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR4A - Installations - Information - Records	Assessed (A)	
IR4B - Installations - Information - Reporting	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**Forward Waste Management Limited****EPR/CB3398ZF**

This compliance assessment report details the following:

- Site inspection undertaken on the 16th of September 2026.
- Review of Quarter 2 (April – June) 2026 waste returns reporting.

Site inspection undertaken on the 16th of September 2026**1. Documentation Review****ISO 0524 PPM Weekly Checks**

The weekly ISO 0524 PPM records for the week commencing 14 September 2026 were reviewed. All required checks had been completed and recorded appropriately. No issues or deficiencies were identified.

Underground Bunded Crash Tank

The annual inspection report for the underground bunded crash tank was reviewed. The inspection was undertaken on 21 July 2026 and identified no defects, concerns, or recommendations requiring further action. The tank was reported to be in satisfactory condition and compliant with inspection requirements.

Certificates of Technical Competence

The following competency records were reviewed as required by permit condition 1.1.4:

- Helen Hope: Hazardous Waste Transfer qualification. Certification valid until 29 June 2028.
- Brett James: Level 4 Hazardous Waste qualification. Certification valid until 10 September 2027.

The certificates reviewed were current and appropriate for the activities undertaken on site.

2. Operational Issues

The site advised that there are ongoing challenges across the sector associated with the removal of waste fridges and freezers following the closure of EMR. These issues are affecting a number of operators nationally.

The site also reported some delays relating to Transfrontier Shipment of Waste (TFS) movements. These delays have been attributed to hauliers adapting to recent legislative changes and revised transport arrangements. At the time of inspection, these delays had not resulted in any compliance concerns and the site appeared to be managing waste inventory levels appropriately.

3. Site Inspection

Waste Storage and Segregation

An inspection of all internal waste storage bays was undertaken.

The storage areas were found to be:

- Well organised and maintained.
- Secure and appropriately managed.
- Clearly labelled.
- Correctly segregated by waste stream.
- Free from excess waste accumulation.

The quarantine bay was inspected and found to contain no waste at the time of the visit.

Inspection of the external storage areas found arrangements to be of a similar standard. Wastes were stored securely, appropriately segregated, and no evidence of spillages or leaks was observed.

Spill Response Equipment

The site's spill response equipment was inspected. The spill kit appeared well stocked and readily available for use should an incident occur.

Surfacing and Infrastructure

The condition of the site's hardstanding was assessed during the walkover. Some areas of surfacing had deteriorated to a degree, with signs of wear and degradation evident.

Site representatives advised that these areas are routinely monitored and are scheduled for repair when deterioration reaches a level requiring intervention. It was noted that the affected areas were not being used for the storage or handling of aqueous wastes and therefore did not currently present a significant pollution risk.

The site was advised to continue monitoring the condition of these areas closely and to establish clear intervention criteria to determine when repair works should be undertaken to prevent further deterioration.

4. Conclusions

Overall, the site was observed to be operating to a good standard. Documentation reviewed during the inspection was up to date, competency requirements were being maintained, and waste storage arrangements were satisfactory.

No compliance issues were identified during the inspection.

Quarter 2 (April – June) 2026 waste returns reporting

The returns were submitted within the reporting window and all received EWC codes are compliant with the permit, returns accepted.

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.