Compliance Assessment Report CAR_NRW0052950

Permit being assessed: AB3697FW.

For: Tegfan Recycling, **held by:** Huw Jones

At: Ynysgerwyn Depot, Aberdulais, Neath, SA10 8HN.

Type of assessment: Site Inspection,

Reason: Routine.

On: 10/09/2026 between 10:45 and 11:45.

Parts of permit assessed: W1A, W2C, W3A, W4B.

NRW Lead Officer: David Morgan.

Report sent to: Huw Jones, Operator, 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	C2 Significant	1.1.1 (a)
W2C - Waste - Operations - Operating techniques	C2 Significant	2.3.1
W3A(2) - Waste - Emissions and monitoring - Emissions to air	C3 Minor	3.1.1
W3G - Waste - Emissions and monitoring - Fire	C2 Significant	3.4.1
W4B - Waste - Information - Reporting	C2 Significant	4.2.2

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
5	128

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	You must review operations on site and ensure activities are compliant with the conditions of the Environmental Permit	11/12/2026

Criteria	Action needed	Complete by
W2C	You must only treat wood waste inside the building or vary your Environmental Permit	04/12/2026
W3A(2)	Remove dust that has escaped site, implement dust suppression systems that prevent escape of dust from site and develop a Dust Management Plan	11/12/2026
W3G	You must manage activities in line with a Fire Prevention and Mitigation Plan that complies with current guidance	11/12/2026
W4B	You must submit all outstanding waste returns information	11/12/2026

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

A routine compliance inspection was undertaken on 10 September 2026. This was the first regulatory inspection of the permitted activities since 1 June 2023.

On 10 September 2026, the following observations were made:

Permitted Activities and Site Operations

During the inspection, it was evident that site operations had changed significantly since the previous inspection. The Environmental Permit held by the Operator, Mr Huw Jones of Tegfan Recycling, is a Standard Rules Permit (SR2008 No. 3) authorising the operation of a household, commercial and industrial waste transfer station.

Historically, operations at the site were focused on the storage and transfer of mixed skip waste and construction and demolition waste. However, at the time of the inspection, the principal activity being undertaken was the treatment and recycling of waste wood. Wood shredding plant and associated equipment were operating within the main yard, and substantial quantities of waste wood were being stored in large stockpiles across the site.

The current Environmental Permit does not authorise the large-scale treatment and recycling of waste wood within the open yard area. If this activity is to continue, the Operator must apply to vary the Environmental Permit to authorise the activity. Alternatively, the activity must cease.

A non-compliance has therefore been recorded against Condition 2.3.1 of the Environmental Permit (Category 2 – Significant) (Ref: W2C).

Condition 2.3.1 of the Environmental Permit requires that all waste, unless classified as a Specified Waste, must be treated within a building. Waste wood is not classified as a Specified Waste and, as such, all treatment activities involving waste wood must be undertaken within a building.

Fire Prevention and Mitigation

At the time of the inspection, waste wood was being stored in a manner that significantly increased the risk of fire. Wood waste was observed in large stockpiles, several metres in height, and in some locations was stored directly against buildings at the rear of the site.

The site's Fire Prevention and Mitigation Plan (FPMP) states that waste wood will not be stored in stacks exceeding 2.4 metres in height. During the inspection, multiple wood waste stockpiles were observed to significantly exceed this limit.

You must ensure that waste wood is stored in accordance with the requirements set out within the site's FPMP. In addition, the FPMP should be reviewed to ensure that it remains compliant with current regulatory guidance. Guidance relating to Fire Prevention and Mitigation Plans is available on the Natural Resources Wales website.

A non-compliance has therefore been recorded against Condition 3.4.1 of the Environmental Permit (Category 2 – Significant) (Ref:W3G).

Amenity

Prior to entering the site on 10 September 2026, there was evidence that site activities were affecting local amenity through the accumulation of dust around the site entrance and adjacent areas.

Whilst the impact was considered minor and it was agreed during the inspection that action would be taken to remove the accumulated dust, you should review the effectiveness of existing dust suppression measures. Dust suppression systems were operational at the time of the inspection; however, their effectiveness should be assessed to ensure that dust emissions are adequately controlled.

A non-compliance has therefore been recorded against Condition 3.1.1 of the Environmental Permit (Category 3 – Minor) (Ref:W3A(2)).

Condition 3.1.2 of the Environmental Permit requires that emissions from the activities are prevented or minimised so as not to cause pollution outside the site boundary.

As it was evident that dust emissions were escaping from the site, you are required to develop and implement a Dust Management Plan. The plan must identify sources of dust, existing control measures, monitoring arrangements, and actions to be taken should dust emissions occur.

The Dust Management Plan must be completed and submitted to Natural Resources

Wales by 4 December 2026.

Waste Returns

Natural Resources Wales records indicate that Waste Returns have not been submitted for the site since the Environmental Permit was issued on 22 December 2017. As a result, Waste Returns remain outstanding for multiple reporting periods and Natural Resources Wales does not hold a complete record of the waste received and removed from the facility.

A non-compliance has therefore been recorded against Condition 4.2.2 of the Environmental Permit (Category 2 - Significant) (Ref: W4B).

Condition 4.2.2 of the Environmental Permit requires the Operator to submit Waste Returns in the specified format and within one month of the end of each reporting quarter.

All outstanding Waste Returns should be submitted to Natural Resources Wales as soon as practicable.

General Management

A number of non-compliances have been identified during this inspection, including breaches relating to operating techniques, fire prevention and mitigation, amenity management and statutory reporting requirements.

Where multiple non-compliances are identified across different aspects of a regulated facility, this may indicate that the site's Environmental Management System (EMS) is not being effectively implemented or maintained.

The nature and range of the non-compliances identified during this inspection indicate a failure to adequately identify, manage and minimise environmental risks associated with the permitted activities. In particular, operations being undertaken on site have materially changed from those authorised by the Environmental Permit, waste wood is not being managed in accordance with the Fire Prevention and Mitigation Plan, dust emissions have affected local amenity, and required Waste Returns have not been submitted.

A non-compliance has therefore been recorded against Condition 1.1.1(a) of the Environmental Permit (Category 2 – Significant) (Ref: W1A).

Condition 1.1.1(a) of the Environmental Permit requires the Operator to manage and operate the activities in accordance with a written management system that identifies and minimises the risk of pollution.

It is recommended that a comprehensive review of site operations, permit requirements, management procedures and the Environmental Management System is undertaken to ensure that activities are managed in compliance with the requirements of the Environmental Permit.

Summary

Operations at the site have changed significantly since the previous compliance inspection and no longer reflect the activities authorised by the current Environmental Permit. The large-scale treatment and recycling of waste wood currently being undertaken is not permitted under the existing permit and is therefore non-compliant.

In addition, the storage of waste wood on site presents an increased fire risk and is not being undertaken in accordance with the site's Fire Prevention and Mitigation Plan. Dust generated by site operations has also been observed to affect local amenity.

The Operator should urgently review site operations and either:

• modify activities to ensure compliance with the existing Environmental Permit; or

• submit an application to vary the Environmental Permit to authorise the activities currently being undertaken.

A Dust Management Plan must be developed and implemented to ensure that dust emissions from the site are adequately controlled. Furthermore, unless and until the Environmental Permit is varied, all treatment of waste wood must be undertaken within a building in accordance with the requirements of the Environmental Permit.

You must also ensure that all outstanding Waste Returns are submitted to Natural Resources Wales and that future Waste Returns are submitted within one month of the end of each reporting quarter.

END OF REPORT

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.