Compliance Assessment Report CAR_NRW0053003

Permit being assessed: EB3893HR.

For: Cox Skip And Waste Management Ltd, **held by:** Owain Thomas

At: Village Farm Road, Village Farm Industrial, Pyle, Bridgend, CF33 6BP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 26/08/2026 between 11:45 and 12:40.

Parts of permit assessed: W1A, W2A, W2C, W4B, .

NRW Lead Officer: Daniel Hopkin, accompanied by Craig Coleman.

Report sent to: Paul Denyer, TCM, on 21/09/2026.

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	C3 Minor	1.1.1
W1A - Waste - Management - General management	C3 Minor	1.1.1
W1A - Waste - Management - General management	C3 Minor	1.1.1
W1A - Waste - Management - General management	Action only (X)	
W2A - Waste - Operations - Permitted activities	C3 Minor	2.1.1
W2C - Waste - Operations - Operating techniques	C3 Minor	2.3.1
W4B - Waste - Information - Reporting	C4 No impact	4.2.2
W1A - Waste - Management - General management	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
6	20.1

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	Ensure all drains on site are clear from any mud or debris.	19/10/2026
W1A	Update your current waste carriers license details to the company name or obtain a new waste carriers licence for the site to remain compliant.	19/10/2026
W1A	Ensure your site's EMS is written in line with the How to comply with your environmental permit document and has adequate information within it to run the site effectively.	19/10/2026
W1A	Please send NRW a copy of your EMS.	19/10/2026
W2A	You must stop the mechanical processing of waste on site immediately. If you wish to undertake mechanical sorting, screening, or other forms of mechanical treatment, you must apply to vary your permit and obtain the necessary authorisation before carrying out these activities.	21/09/2026
W2C	Ensure you are following your permit and store all non-specified wastes in a building or secure container.	19/10/2026
W4B	Please submit the missing quarterly waste returns.	19/10/2026
W1A	Review all waste classifications assigned to mirror-entry wastes accepted, stored, and processed on site. Provide NRW with evidence of the waste assessment methodology used to determine hazardous and non-hazardous classifications, in accordance with WM3 guidance. This should include details of any sampling strategy, where applicable, together with supporting records for the classifications assigned.	19/10/2026

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.

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

Cox Skip and Waste Management Ltd - EPR-EB3893HR

Waste Regulation Officer Daniel Hopkin and Senior Waste Regulation Officer Craig Coleman attended the permitted facility of Cox Skip and Waste Management Ltd at

Plot 80, Village Farm Road, Village Farm Industrial Estate, Pyle, Bridgend, CF33 6BN on the 26th of August 2026. Cox Skip holds a Standard Rules SR2008 No1 – household, commercial and industrial waste transfer station for this site. This was an unannounced site inspection of the site.

During the inspection the site's Technically Competent Manager(TCM) Paul Denyer was available to answer our questions. The weather was warm and dry, we arrived at 11:45.

There were breaches recorded during the site inspection detailed below.

W1A General management – Category 3 (C3) Breach

Permit condition 1.1.1 states: ***"The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints."***

We have issued you a C3 breach of your permit under sub-criteria W1A General Management, due to the drainage channels on site being blocked. The reasonably foreseeable impact was minor, as there was no discharge leaving the site at the time of the inspection.

During the inspection Officers could see that the drainage channels at the site had not been cleaned out (as seen in photo 1 below). The site drainage channels should be kept clear and free from debris to ensure the effective collection of any surface water to the drains. Blocked drainage channels can result in standing water, increasing the risk of contaminated runoff, reduced drainage capacity during periods of heavy rainfall, and the potential for pollutants to bypass the site's drainage controls. Accumulated water can also contribute to the deterioration of the impermeable surface and hardstanding on site, creating housekeeping and health and safety issues. Maintaining clear drainage channels is therefore an important part of preventing pollution and ensuring the site's drainage infrastructure operates as intended.



Photo 1

Action: Ensure all drains on site are clear from any mud or debris. Please send evidence this has been completed by the 19th of October 2026.

Additionally,

Permit condition 1.1.1 states: ***"The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints."***

We have issued you a second C3 breach of your permit under sub-criteria W1A General Management, due to your waste carriers licence being registered under the sites TCM and not the company name.

During follow up-desk based checks after the inspection, we noted that your waste carriers license is in the name of the TCM, Paul Denyer and not the company name, Cox Skip and Waste Management Ltd.

Your management system must explain how you will comply with the requirements of waste Duty of Care. This includes ensuring any waste carriers you accept waste from are registered and all waste the business transports is under an appropriately registered waste carriers license. You must ensure your management system includes procedures explaining how you will comply the requirements of Duty of Care and you must operate in line with these procedures.

To comply with your duty of care requirements you must change your waste carriers license (CBDU3826) to the name the site permit is in, Cox Skip and Waste Management Ltd. This will allow all suitably qualified employees of Cox Skip and Waste Management Ltd to transport controlled waste legally. As the waste carriers license of Cox Skip and Waste Management Ltd is

under the TCM, Paul Denyer's name this only allows the named person to transport controlled waste. Transporting waste without a waste carriers license is an offence under the Control of Pollution (Amendment) Act 1989 and to ensure compliance your waste carriers license must reflect the business transporting waste or a new waste carriers license registered in your business name.

Under paragraph 30(2) of the Waste (England and Wales) Regulations 2011, if NRW becomes aware that the information held on the public register is incorrect in respect of any carrier, broker, or dealer, it may remove that person from the register where it is reasonable to do so.

Further information around updating waste carrier license records or registering an additional waste carriers license is on our website https://naturalresources.wales/permits-and-permissions/waste-permitting/register-as-a-waste-carrier-broker-or-dealer/?lang=en.

Action: Update your current waste carriers license details to the company name or obtain a new waste carriers licence for the site to remain compliant. Please complete by the 19th of October 2026.

Additionally,

Permit condition 1.1.1 states: ***"The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints."***

We have issued you a third C3 breach as a root cause breach of your permit under sub-criteria W1A General Management, due to observations made during the inspection indicating that the site is not being managed appropriately.

During the inspection, Officers requested to see the designated storage area for plasterboard waste. As the site operates as a skip and mixed waste facility, suitable arrangements for the segregation and storage of plasterboard waste would be expected to form part of normal site operations. The skip identified by the operator as being designated for plasterboard storage contained no plasterboard waste and displayed no signage to indicate its intended use. The absence of clearly identified storage arrangements raises concerns regarding the site's ability to effectively segregate waste streams and demonstrate that wastes are being managed in accordance with permit requirements.

Officers also observed waste and skips stored throughout the site with no clearly identifiable storage plan or routine for the placement, segregation, and management of incoming wastes. Effective site management requires waste streams to be stored in designated locations, clearly identified, and managed in a way that allows operators to maintain control over waste movements and storage capacities. Poor organisation increases the risk of incompatible wastes being stored together, delays in identifying non-conforming wastes, reduced inspection capability, housekeeping issues, and an increased risk of pollution incidents occurring.

Furthermore, the operator advised Officers that staff were reluctant to undertake certain tasks. This raises concerns regarding staff competence, supervision, and the effectiveness of training arrangements on site. A well-managed waste facility should ensure that all staff are appropriately

trained, understand their duties and responsibilities, and are capable of carrying out the tasks necessary to maintain compliance with permit conditions and site management procedures.

Taken together, these observations indicate weaknesses in the implementation of the site's management system. Effective management of a regulated waste facility requires clear waste segregation arrangements, defined storage areas, effective housekeeping, competent staff, and management oversight to ensure that operations are controlled and carried out in accordance with the permit and Environmental Management System (EMS).

Action: Ensure your site's EMS is written in line with the How to comply with your environmental permit document and has adequate information within it to run the site effectively.

Action: Please send NRW a copy of your EMS.

W2A Permitted activities – Category 3 (C3) Breach

Permit condition 2.1.1 states: ***"2.1.1 The operator is only authorised to carry out the activities specified in table 2.1 below ("the activities").***

Table 2.1 activities	
Description of activities	**Limits of activities**
D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced) **R13**: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) **D14:** Repackaging prior to submission to any of the operations numbered D1 to 13 **D9**: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12 **R3**: Recycling/reclamation of organic substances which are not used as solvents **R4**: Recycling/reclamation of metals and metal compounds **R5**: Recycling/reclamation of other inorganic materials	Treatment consisting only of manual sorting or manual separation of waste into different components for disposal, (no more than 50 tonnes per day) or recovery. No more than a total of 50 tonnes of intact and shredded waste vehicle tyres (waste codes 16 01 03 and 19 12 04) shall be stored at the site.

We have issued you a C3 breach of your permit under sub-criteria W2A Permitted Activities, due to the use of a trommel machine on site to sort and segregate waste material. The reasonably foreseeable impact was minor, but this is not a permitted activity in your permit and has not been risk assessed for your site.

During the inspection, officers observed evidence that waste had been mechanically sorted and separated through the use of a trommel screening machine (Seen in photo 2 below). The permit only authorises the treatment of waste by manual sorting and separation. The use of mechanical screening

equipment therefore constitutes a non-compliance with the permitted activities specified within the permit.

If you are considering adding other activities to your permit you will need to apply for a permit variation with NRW.



Photo 2

Action: **You must stop the mechanical processing of waste on site immediately. If you wish to undertake mechanical sorting, screening, or other forms of mechanical treatment, you must apply to vary your permit and obtain the necessary authorisation before carrying out these activities.**

W2C Operating Techniques – Category 3 (C3) Breach

Permit condition 2.3.1 states: ***"The activities shall be operated using the techniques and in the manner described in Table 2.3 below."***

Table 2.3 Operating techniques
1. Unless stored or treated outside as specified waste[2]: a) all bulking, transfer or treatment of waste shall be carried out inside a building; b) all waste shall be stored in a building or within a secure container. c) all waste shall be stored and treated on an impermeable surface with sealed drainage system. 2. Specified waste shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system.

We have issued you a C3 breach of your permit under sub-criteria W2C Operating Techniques, due to the site storing non specified waste outside and not on an impermeable surface with a sealed drainage system. This was seen as a minor impact to the environment as the likelihood of the waste resulting in significant pollution was considered low. However, the storage of this waste in this manner is not permitted and is not compliant with the conditions of your permit.

During the inspection Officers identified waste that is not listed as specified waste in your permit being stored outside (see photos 3 & 4 below). All waste unless specified waste must be stored inside a building as stated in Table 2.3 of your permit.





Photo 3 Photo 4

Action: Ensure you are following your permit and store all non-specified wastes in a building

or secure container. Please send evidence this has been completed by the 19th of October 2026.

W4B Reporting – Category 4 (C4) Breach

Permit condition 4.2.2 states: ***"Within one month of the end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter."***

We have issued you with a C4 breach of your permit under sub-criteria W4B Reporting, due to the site not submitting quarterly waste returns.

NRW have not received any quarterly waste returns for 2026 from you . Here is a list of waste returns required to remain compliant.

- Jan - March 2026
- April – June 2026

Action: Please submit the missing quarterly waste returns. Complete by the 19th of October 2026.

Advice and Guidance

As part of this inspection, NRW officers completed a questionnaire relating to wastes being removed from the site and their associated EWC. This questionnaire forms part of a wider programme being undertaken to better understand how waste outputs from permitted waste treatment facilities are generated, classified and managed. We are carrying out work on waste outputs from permitted waste treatment sites to better understand how waste streams are being generated and managed.

During the inspection, it was identified that a number of waste streams, particularly 17 09 04 (mixed construction and demotion wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03) and 17 05 04 (soils and stones other than those mentioned in 17 05 03) are currently being assigned non-hazardous mirror entries without evidence of a documented waste assessment process having been undertaken.

The information provided during the inspection indicated that non-hazardous mirror codes are being routinely applied without supporting waste characterisation, sampling data, and documented methodology demonstrating how the hazardous properties have been assessed and ruled out.

The assignment of a non-hazardous mirror codes cannot be based solely on visual inspection. Where a waste is potentially subject to a mirror entry, the operator must demonstrate that the waste has been assessed in accordance with the WM3 guidance. This includes consideration of, the origin and nature of the waste, knowledge of the process that generated the waste, potential contaminants associated with the source material and an assessment of hazardous properties in accordance with WM3.

To demonstrate compliance with waste classification requirements, you must develop and

implement a documented waste assessment and sampling methodology for all relevant mirror-entry wastes produced and accepted on site in accordance with Appendix D WM3.

NRW expects waste operators to be able to justify the classification assigned to all waste streams, particularly those falling within mirror entries. Evidence should be available on request to demonstrate how classifications have been determined.

Until a suitable assessment has been undertaken in accordance with WM3, the current use of non-hazardous mirror codes for these waste streams cannot be considered adequately justified. You should therefore review all relevant waste classifications and implement a compliant waste characterisation and sampling plan to ensure that waste descriptions are accurate and supported by appropriate evidence.

Action: Review all waste classifications assigned to mirror-entry wastes accepted, stored, and processed on site. Provide NRW with evidence of the waste assessment methodology used to determine hazardous and non-hazardous classifications, in accordance with WM3 guidance. This should include details of any sampling strategy, where applicable, together with supporting records for the classifications assigned. Please send evidence this has been completed by the 19th of October 2026.

Thank you for your time during the inspection. The site inspection concluded at 12:40.

If you have any queries regarding this Compliance Assessment Report, please contact me on the details below.

Daniel Hopkin
Daniel.Hopkin@CyfoethNaturiolCymru.gov.uk

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.