Compliance Assessment Report CAR_NRW0053014

Permit being assessed: VP3095FS.

For: Soil and Aggregates Treatment Plant, **held by:** Neal Soil Suppliers Ltd

At: Atlantic Ecopark, Newton Road, Rumney, Cardiff, CF3 2EJ.

Type of assessment: Audit,

Reason: Routine.

On: 13/03/2026 between 09:00 and 17:00.

Parts of permit assessed: 1.1.1 and 4.1.2.

NRW Lead Officer: Geraint Harris.

Report sent to: Group Technical Manager, Group Technical Manager, on 22/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	1.1.1(a)
IR4A - Installations - Information - Records	C3 Minor	4.1.2

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

Total non-compliances recorded	Total non-compliance score
2	8

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
IR1A	Action 1: NSSL shall provide NRW with a written response detailing: 1. How information relating to each waste consignment removed from the regulated facility, including how waste quantities are determined, recorded and retained, is managed in practice; 2. Details of any differences between the arrangements currently implemented in practice and those described within the NSSL - Waste Movement to RML Procedure Version 1.4,	30/10/2026

Criteria	Action needed	Complete by
	including the Load Disposal Details section; and 3. Where any differences exist between documented procedures and current operational practice, details of those differences and the actions proposed to address them. Where the records and arrangements currently maintained by NSSL do not reflect the requirements specified within the NSSL - Waste Movement to RML Procedure Version 1.4, NSSL shall review and amend the management system to accurately reflect current operational practices. Any amendments to the management system shall be supported by a written justification demonstrating how the revised arrangements identify and minimise risks of pollution, maintain effective control and traceability of waste movements, and ensure ongoing compliance with Permit Condition 1.1.1(a). Action response due 30th October 2026.	
IR4A	NSSL shall ensure that records relating to waste consignments transferred from the NSSL regulated facility, including those identified within the "Load Disposal Details" section of the NSSL - Waste Movement to RML Procedure Version 1.4, are retained and maintained on the NSSL site in accordance with Permit Condition 4.1.2.	22/09/2026

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

Neal Soil Supplier Ltd.'s Compliance Assessment Report

Neal Soil Supplier Ltd.'s (NSSL) waste pre-acceptance, acceptance and movement activities are undertaken in accordance with IMS Procedure WI01 and the site's *Movement of Waste from NSSL to RML* procedure. Accordingly, this audit assessed compliance against the requirements of these documented management system procedures, together with relevant permit requirements where applicable.

The audit was undertaken at NSSL's offices on the 13th March 2026 and included discussions with operational, technical and management personnel, review of documentation, and observations of site activities. Following the site visit, additional information and supporting evidence were requested from NSSL and subsequently reviewed through email correspondence. The findings of this report are

therefore based on both the observations made during the audit and the additional information provided after the inspection.

The audit identified that NSSL has implemented formal arrangements for waste pre-acceptance, characterisation and compliance testing. Waste appraisal and acceptance activities are undertaken by personnel with relevant qualifications, training and experience. Pre-acceptance assessments are completed using the Hazardous Waste Online (HWOL) system and are supported by reviews of site investigation reports and other available information such as sampling plans. Waste streams cannot be added to the weighbridge system without technical approval, providing a documented checkpoint within the acceptance process. The effectiveness of these arrangements is discussed in the findings below.

The audit confirmed that NSSL maintains documented arrangements for the management and retention of waste acceptance records, technical appraisals and supporting documentation through a cloud-based document management system. Operational controls observed onsite included segregated waste storage areas, designated waste pods, quarantine arrangements for suspect or non-conforming materials, and visual inspection of incoming loads. These measures support the identification, segregation and management of waste streams throughout the acceptance process.

NSSL has undertaken WM3 characterisation and monitoring of Warrior Fines and has generated an analytical dataset over a two-year period. The audit observed that the site conducts annual reviews of waste characterisation data, including trend analysis and comparison of contaminant concentrations against hazardous waste thresholds. These arrangements are used by NSSL to inform the classification of Warrior Fines and to assess the consistency of the waste stream over time.

Based on the evidence reviewed during this audit, no instances were identified of NSSL accepting waste outside the scope of its waste acceptance criteria. This finding is limited to the sample of records, activities and observations examined during the audit. The site's waste acceptance arrangements include waste appraisal by technically qualified personnel, analytical monitoring, and operational controls intended to support compliance with waste acceptance and classification requirements.

Notwithstanding the above points, the audit identified several areas where site practices rely significantly on staff knowledge, experience and management oversight rather than being fully supported by documented procedures, assurance activities and objective records. Whilst personnel interviewed demonstrated a good understanding of the relevant processes and controls, several activities were either not formally documented, were not sufficiently detailed within the Environmental Management System (EMS), or could not be fully verified during the audit.

In particular, opportunities for improvement were identified in relation to:

- Sampling governance and demonstration of sample representativeness.
- Procedural documentation for waste acceptance and inspection activities.
- Sample reduction, storage and quality assurance arrangements.
- Management system verification and internal auditing.

- Competency assessment and refresher arrangements.
- Consistency between documented procedures and operational practice.
- Record keeping associated with waste removed from the regulated facility.

Sampling arrangements represent the most significant area requiring improvement. NSSL has developed a documented sampling methodology within its *Movement of Waste from NSSL to RML* procedure, which incorporates key WM3 principles, including composite sampling and sampling from across stockpile dimensions. However, limited evidence was available during the audit to demonstrate how these requirements are consistently implemented in practice. The individual responsible for sampling was unavailable for interview, sampling activities were not observed, and records demonstrating the selection of sampling locations, sample reduction methods, verification of representativeness, and routine quality assurance checks were not available for review.

Whilst the procedure specifies stratified random sampling across the width, breadth and height of each stockpile and requires composite samples comprising several scoops from randomly selected locations, the audit was unable to verify how these requirements are implemented and documented for individual batches. In particular, there was limited evidence of defined sampling grids, documented sample location selection, minimum increment numbers, hotspot sampling, duplicate or retained samples, composite sample preparation methods, or other quality assurance controls to demonstrate sampling consistency and representativeness. The procedure also provides limited detail regarding the adjustment of sampling effort to account for waste heterogeneity and the preservation, storage and transport of samples. Consequently, further procedural detail and contemporaneous records are required to demonstrate that analytical samples are consistently representative of the waste being classified and transferred in accordance with WM3 expectations.

Similarly, visual inspection and acceptance checks are undertaken at the weighbridge and operational personnel demonstrated a good understanding of acceptance and rejection requirements. However, no site-specific written guidance or inspection checklist was available for personnel undertaking these checks. As a result, acceptance decisions rely primarily upon operator experience and judgement, which may introduce the potential for inconsistency should personnel change.

The audit also identified limited formal verification of waste acceptance and sampling activities. Evidence of structured internal audits, witnessed sampling exercises, documented competency assessments and formal supervisory assurance checks could not be demonstrated during the audit. Whilst experienced management oversight is in place, the absence of documented assurance activities limits the site's ability to provide objective evidence that critical environmental controls are implemented consistently and remain effective over time. ISO 14001 recognises internal auditing as a key mechanism for evaluating whether environmental management arrangements are effectively implemented and maintained.

The audit further noted that rejected loads and pre-acceptance failures are generally not recorded as formal non-conformances because the wastes are refused prior to entering the permitted waste management process. Although such occurrences may be infrequent, recording and reviewing these events would provide opportunities to identify trends, capture learning from near-misses and further

strengthen waste acceptance controls.

During a compliance audit undertaken on the 13th March 2026, NRW assessed the NSSL's arrangements for the characterisation, approval and transfer of Warrior Fines from the regulated facility. The audit included a review of the NSSL's documented management system procedures, including the procedure entitled *NSSL - Waste Movement to RML Procedure Version 1.4*, which had previously been provided to NRW by NSSL.

Following the site inspection, NRW undertook a detailed review of the information gathered during the audit and identified concerns regarding the implementation of the documented arrangements associated with waste transfers from the site.

During the onsite audit, NRW requested evidence demonstrating implementation of the *Load Disposal Details* section of NSSL's - *Waste Movement to RML Procedure Version 1.4*. The procedure states that the business will hold on file the following information for waste transferred to RML:

- Unique Batch ID;
- Unique transaction number;
- Type of waste (EWC Code and Description);
- Source of waste;
- Vehicle details; and
- Weight of material.

During the audit, NSSL advised that outbound Warrior Fines loads are not weighed using the site weighbridge and that vehicle-mounted onboard weighing systems are relied upon to determine load tonnage. NSSL further advised that weight information is recorded at the receiving facility. NRW was unable to identify records demonstrating that the information specified within procedure NSSL - Waste Movement to RML Procedure Version 1.4, was routinely retained for individual consignments removed from the regulated facility.

NRW subsequently emailed NSSL on the 31st March 2026 outlining concerns regarding the absence of evidence demonstrating the retention of records relating to waste removed from the site. The correspondence also highlighted NRW's expectation that details of waste loads leaving the site should be recorded and retained by the operator. No information was subsequently provided that demonstrated implementation of this aspect of the documented procedure.

NRW therefore concludes that NSSL failed to demonstrate implementation of this element of its management system and failed to demonstrate that records identified within the management system were being retained in accordance with NSSL's documented procedures.

Permit Condition 1.1.1(a) requires the operator to manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution. Permit Condition 4.1.2 requires the operator to keep on site all records, plans and the management system required to be maintained by the permit.

NRW considers that where an operator establishes documented controls and procedures as part of its management system, implementation should be capable of being demonstrated through appropriate records and evidence. In this case, NRW was unable to verify that the requirements contained within NSSL's documented procedure relating to the recording and retention of waste transfer information were being implemented as described. Furthermore, despite being requested during the audit and subsequent correspondence, no evidence was provided to demonstrate that records which the procedure stated would be "held on file", including waste descriptions, transaction details and load weights, were being retained and maintained as required.

Whilst NSSL advised that certain information, including load weight information, may be recorded at the receiving facility, NRW was not provided with evidence demonstrating that records identified within the *NSSL - Waste Movement to RML Procedure Version 1.4* were retained by NSSL and available on site in accordance with the documented arrangements.

The inability to demonstrate implementation of the documented procedure reduced the traceability and auditability of waste movements from the regulated facility. In the absence of evidence provided to NRW demonstrating that the information specified within the procedure was being routinely retained, NRW was unable to independently verify waste movements or reconcile transferred quantities against other waste transfer and reporting records. This reduced regulatory confidence in NSSL's ability to demonstrate the movement of waste from the site and the accuracy of associated waste transfer information.

NRW notes that these concerns are particularly relevant given the importance of waste movement records in supporting the accuracy of reported waste quantities submitted under Permit Condition 4.2.5. Subsequently, NRW served a Regulation 36 Enforcement Notice on NSSL on the 27th July 2026 in relation to concerns regarding the apparent inaccurate reporting of information pertaining to wastes removed from the regulated facility and requiring future waste returns to be accurate and correct.

NRW also notes that, subsequent to the audit, a statutory notice was served under Section 34(5) of the Environmental Protection Act 1990 and Regulation 35 of the Waste (England and Wales) Regulations 2011 requiring Neal Soil Suppliers Limited to provide detailed information relating to controlled waste transfers exported from the site, including the quantity, description, date and destination of individual transfers. Whilst breaches of directly applicable legislation are not scored within the CAR framework, NRW may consider such matters separately in accordance with its Enforcement and Sanctions Policy. These matters are also being considered as part of wider investigations relating to waste transfer and record-keeping arrangements within the Dauson Group.

Action 1: NSSL shall provide NRW with a written response detailing:

1. How information relating to each waste consignment removed from the regulated facility, including how waste quantities are determined, recorded and retained, is managed in practice;

1. Details of any differences between the arrangements currently implemented in practice and those described within the NSSL - Waste Movement to RML Procedure Version 1.4, including the Load Disposal Details section; and
3. Where any differences exist between documented procedures and current operational practice, details of those differences and the actions proposed to address them. Where the records and

arrangements currently maintained by NSSL do not reflect the requirements specified within the *NSSL - Waste Movement to RML Procedure Version 1.4*, NSSL shall review and amend the management system to accurately reflect current operational practices. Any amendments to the management system shall be supported by a written justification demonstrating how the revised arrangements identify and minimise risks of pollution, maintain effective control and traceability of waste movements, and ensure ongoing compliance with Permit Condition 1.1.1(a).

Action response due 30th October 2026.

NRW identified a failure to adequately demonstrate implementation of a documented management system procedure relating to the transfer of waste from the regulated facility and a failure to demonstrate retention of records specified within that management system. Although no immediate direct environmental impact was identified, NSSL was unable to demonstrate that the record-keeping requirements specified within its own documented procedure were being implemented in practice. This reduced NRW's ability to independently verify waste movements and diminished regulatory confidence in the traceability and auditability of waste transfers from the site.

NRW further considers that this issue is also relevant to Permit Condition 4.1.2, which requires the operator to keep on site all records, plans and the management system required to be maintained by the permit, unless otherwise agreed in writing by NRW. The operator's Environmental Management System forms part of the management arrangements required by Permit Condition 1.1.1(a), and the documented *NSSL - Waste Movement to RML Procedure Version 1.4* states that the business will retain specific information relating to waste consignments transferred to RML, including unique batch identifiers, transaction numbers, waste descriptions, sources, vehicle details and weights of material.

During the audit and subsequent correspondence, NRW requested evidence demonstrating that the records identified within the NSSL - Waste Movement to RML Procedure Version 1.4 were being retained and maintained by NSSL. No evidence was provided to demonstrate implementation of these documented record-keeping arrangements. NRW was therefore unable to verify compliance with the procedure or with Permit Condition 4.1.2. Accordingly, NRW considers that NSSL failed to demonstrate that records identified by its management system as being "held on file" were being retained and maintained on site in accordance with the documented procedure. Permit Condition 4.1.2 requires NSSL to keep on site all records, plans and management system documentation required to demonstrate compliance with the permit. NRW therefore considers Permit Condition 4.1.2 has been breached.

NRW therefore considers a Category 3 breach of Permit Condition 1.1.1(a) and a Category 3 breach of Permit Condition 4.1.2 to be appropriate.

Action 2: NSSL shall ensure that records relating to waste consignments transferred from the NSSL regulated facility, including those identified within the "Load Disposal Details" section of the NSSL - Waste Movement to RML Procedure Version 1.4, are retained and maintained on the NSSL site in accordance with Permit Condition 4.1.2. Action must be undertaken immediately.

Finally, a number of key control measures could not be fully verified during the audit because the relevant personnel were unavailable or the activities were not taking place at the time of inspection.

In particular, the sampling process described within the management system was not witnessed and the practical implementation of sampling, sample preparation and sample reduction activities could not be independently verified. Consequently, some audit conclusions necessarily rely on documentation and staff interviews rather than direct observation. A follow-up inspection will therefore be arranged to observe the sampling procedures in operation and provide additional assurance regarding implementation of the documented management system arrangements.

Overall, the audit concluded that NSSL has established a broadly effective waste acceptance and characterisation framework supported by competent personnel and extensive analytical monitoring. However, improvements are required to strengthen demonstrable compliance with NRW Appropriate Measures guidance and WM3, particularly in relation to representative sampling, procedural documentation, management system assurance, verification activities and record keeping. Addressing these matters would improve resilience against personnel changes, strengthen evidential compliance, and provide greater assurance that critical environmental controls are implemented consistently and effectively**.**

Documents Observed

IMS Procedure WI01 (Waste Pre-Acceptance and Acceptance)

NSSL - Waste Movement to RML Procedure - v1.4

IMS12 – Non Conformance

NSSL- Environmental Training Spreadsheet

2025 Annual Statistical Review (Qualifying Fines)

Warrior Fines WM3 Waste Classification Report

Chemtech Chain of Custody Form (sample submission form)

NSSL Further Questions - 20-03-2026 – Response - Evidence folders referenced in NSSL's response document:

- Question 1 & 2 Evidence Folder
- Question 5 Evidence Folder
- Question 6-11 Evidence Folder
- Question 13 Evidence Folder
- Question 16 Response File
- Question 17 Evidence Folder

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.