Compliance Assessment Report CAR_NRW0052229

Permit being assessed: CB3791ZU.

For: Mobile Plant, **held by:** Evan Williams

At: .

Type of assessment: Report/Data Review,

Reason: Routine.

On: 01/07/2026.

Parts of permit assessed: As below. .

NRW Lead Officer: Cheryl Griffiths.

Report sent to: Evan Williams, Operator , on 30/09/2026.

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(b)
W1A - Waste - Management - General management	Action only (X)	
W4A - Waste - Information - Records	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
1	31

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	The operator must complete the necessary training and obtain the relevant Technically Competent Manager (TCM) qualification to ensure that a valid TCM is in place for Permit CB3791ZU.	02/11/2026
W1A	A copy of the valid TCM certificate must be submitted to NRW immediately upon qualification being obtained.	09/11/2026

Criteria	Action needed	Complete by
W4A	All future records should clearly identify the relevant local authority area(s) from which waste originates and where waste is recovered or removed.	31/10/2026

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

This report is a follow-up to the review of the 2026 quarterly waste return submitted for Permit CB3791ZU, undertaken on 10 June 2025. The review required the operator to complete specified actions stated in CAR_NRW0052071 by the 29 June 2026.

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W1A - General Management

Permit condition 1.1.1(b) states that *"the operator shall manage and operate the activities using sufficient competent persons and resources."*

The operator was required to submit a current and valid Technically Competent Manager (TCM) certificate to NRW by 29 June 2026.

During a telephone conversation on 16 June 2026, the operator confirmed that they had not completed the necessary training to obtain the relevant qualification since permit CB3791ZU was issued and were therefore unable to provide a valid TCM certificate.

The absence of a TCM removes a key permit control designed to ensure waste activities are managed by a suitably qualified and competent person who can comply with permit conditions and minimise environmental risk.

The risk associated with this non-compliance is increased by the nature and scale of the activity and could result in environmental harm. Since the permit was issued, approximately 120,000 tonnes of higher-risk waste have been spread under the permit while the operator has been unable to demonstrate the required level of technical competence.

Whilst the CIWM (WAMITAB) Operator Competence Scheme provides a 12-month grace

period from the date of permit issue for operators to obtain the necessary technical competence qualification, this provision is not applicable in this case. More than 12 months have elapsed since the permit was issued on the 14 November 2022, and the operator has failed to achieve the required qualification within the prescribed timeframe. The operator is therefore in breach of the operator competence requirements associated with the permit.

Action: ***The operator must complete the necessary training and obtain the relevant Technically Competent Manager (TCM) qualification to ensure that a valid TCM is in place for Permit CB3791ZU. A copy of the valid TCM certificate must be submitted to NRW immediately upon qualification being obtained. Failure to complete the required training and obtain the relevant TCM qualification may result in NRW refusing any future requests for deployment, until satisfactory evidence of competence and qualification has been provided.***

A CCS Category 2 score has been issued in response to this non-compliance against permit condition 1.1.1(b). The operator has failed to maintain a technically competent manager, removing a key management control intended to prevent pollution and ensure permit compliance. Given the amount of higher-risk waste that's been spread under this permit during this period, the non-compliance poses a higher risk of environmental harm.

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W2A - Permitted activity

Permit condition 2.1.1 states that ***"the operator is only authorised to carry out the activities specified in table 2.1 below ('the activities')." In accordance with Table 2.1, waste accepted at the site must not be stored for longer than 12 months.***

NRW requested as recorded in CAR_NRW0052071 on the 10 June 2026 for the operator to provide:

- Confirmation that no waste had been stored beyond the 12-month storage limit; and
- Details of any waste removed from the site, including dates of removal and destination facilities.

During a telephone conversation with the operator on 16 June 2026, the operator confirmed that all waste accepted at the site is spread onto land on the same day that it is received. The operator confirmed that waste is therefore not stored on site and is not held beyond the 12-month storage limit.

Based on the information provided during the telephone discussion, NRW is satisfied that no further action is required at this time. However, compliance with the permit requirements may be reassessed during future site inspections, and any evidence of waste being stored on site beyond the permitted timescales may result in further regulatory action.

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W4A - Records

Permit condition 4.1.1(a) states that ***"All records required to be made by these***

standard rules shall: (a) be legible."

NRW requested as recorded in CAR_NRW0052071 on the 10 June 2026 for the operator to provide:

- Confirm the local authority area(s) from which waste received at the site originated;
- Where this information was unavailable, provide a written explanation outlining why the local authority could not be identified and justify the use of "Wales" as a last-resort entry within the waste return; and
- Submit an updated waste return that accurately reflected waste management activities at the site, including the receipt, recovery and removal of waste.

Following a review of the Gov guidance, it states that reporting for mobile plant permits differs from other waste activities. Guidance on how to correctly complete your quarterly waste returns can be found here: Landspreading: how to comply with your permit - GOV.UK

Action: ***Ensure that the operator use the gov guidance when completing and submitting your quarterly waste returns in the future.***

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NRW would like to thank Evan Williams for their assistance and co-operation and if you have any further questions about the contents of this inspection report, please do not hesitate to contact us.

Any compliance criteria not highlighted in the above summary should be considered as not assessed.

"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".

ENDS

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.