Compliance Assessment Report CAR_NRW0050506

Permit being assessed: VP3494FK.

For: Melin Plas Du, **held by:** M O Jones

At: Yffor, Pwllheli, Gwynedd, LL53 6RF.

Type of assessment: Site Inspection,

Reason: Routine.

On: 15/01/2026 between 11:15 and 13:30.

Parts of permit assessed: See below. .

NRW Lead Officer: Cheryl Griffiths, accompanied by Leon Williams.

Report sent to: M O Jones, Permit 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	C3 Minor	1.1.1(a)
W1A - Waste - Management - General management	C3 Minor	1.1.1(a)
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	C3 Minor	1.1.1(a)
W1A - Waste - Management - General management	C3 Minor	1.1.1(a)
W1A - Waste - Management - General management	C3 Minor	1.1.1(a)
W1A - Waste - Management - General management	Action only (X)	
W2C - Waste - Operations - Operating techniques	C3 Minor	2.3.1.(a)
W2D - Waste - Operations - The site	C3 Minor	2.2.1
W4A - Waste - Information - Records	C3 Minor	4.1.1(a)

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

Total non-compliances recorded	Total non-compliance score
8	32

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	To develop and implement waste storage procedures within your EMS as stated in the 'How to comply with your Environmental Permit'.	08/06/2026
W1A	Develop controls to manage waste stockpile heights within FPMP limits, including monitoring systems and clear height markers, and maintain these at all times.	08/06/2026
W1A	Manage wood waste stockpiles to ensure that storage heights do not exceed 4 metres.	08/06/2026
W1A	Ensure that the site's TCM has completed all required refresher training and reassessments and to submit a copy of the Continuing Competence certificate to NRW.	08/06/2026
W1A	Ensure that all waste removed from the site is transferred only to a suitably permitted facility.	08/06/2026
W1A	Ensure that all required waste sampling and supplementary testing to produce end of waste quality aggregates is completed in full and in accordance with the site’s Factory Production Control (FPC) Manual and the WRAP Quality Protocol.	08/06/2026
W1A	Ensure all waste sampling for disposal and recovery for mirror entry waste codes follow Appendix D of WM3 and your EMS procedures.	08/06/2026
W1A	Send a copy of your most up to date hazardous waste characterisation analysis (WM3 classification) for mirror entry waste streams to NRW.	09/06/2026
W2C	Washing of waste should cease immediately. A permit variation should be sought to add this method of treatment to the site permit or a written confirmation to NRW that the wash bath will not be used.	08/06/2026
W2D	Cease storing any waste beyond the permitted site boundary. Remove any waste stored beyond the site boundary and re-submit a complete and fully supported permit variation application.	08/06/2026
W4A	Ensure that all waste transfer notes and quarterly waste returns are legible by containing accurate information.	08/06/2026

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 was an unannounced routine site inspection carried out on Thursday, 15 January 2026, by Natural Resources Wales (NRW) Waste Regulation Officer Cheryl Griffiths and Senior Waste Regulation Officer Leon Williams.

Upon arrival, officers were greeted by the Director, Meurig Jones, who was later joined by Rhiryd ab Owain, both of whom accompanied us during the initial stages of the inspection. A further representative, Peryf Ab Owain, joined the visit at a later point and accompanied NRW officers for the remainder of the inspection.

This site visit was a routine inspection which was also aimed to verify and assess whether the actions identified in the previous Compliance Assessment Report, CAR_NRW0049613 for the site visit that took place on the 5th of August 2025, had been fully completed and appropriately implemented.

NRW also wishes to highlight that during a site inspection undertaken by a previous Waste Regulation Officer on 9 January 2025, it was confirmed that the site had previously accepted waste screenings coded 19 08 01. NRW understands that this activity has since ceased.

During previous discussions with your former regulating officer, you indicated that you were considering adding EWC 19 08 01 to your permit. Please note that if you wish to accept EWC 19 08 01, it must be included in a variation application, along with all required supporting information.

NRW advises that any new waste types must be clearly identified and fully justified in future variation submissions.

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A summary of the visit as follows:

Permit conditions assessed

W1A - General Management

As stated in permit condition 1.1.1(a), *'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'.*

Following NRW's previous visit to the site dated 5 August 2025, concerns were raised in *CAR_NRW0049613* regarding non-hazardous waste which was stored up high and falling out of the transfer building. As a result, an action was issued requiring the operator to develop and implement waste storage procedures by the 1 December 2025 within the site's Environmental Management System (EMS). These procedures were to address, as a minimum:

- Measures to ensure maximum storage time limits are not exceeded.
- Measures to ensure storage capacities are not exceeded.
- Controls setting out the maximum permissible size of waste piles, including length, width, and height.
- Procedures for the segregation of incompatible wastes, including appropriate separation distances and/or suitable engineering measures.

On 6 January 2026, following the deadline, NRW requested copies of the updated waste storage procedures via email however, these were not provided.

During the inspection on the 15 January 2026, officers again raised the matter. During this visit, Peryf Ab Owain stated that the site's environmental consultant is currently working on developing the required procedures outlined in *CAR_NRW0049613.*

As the operator failed to develop and implement these procedures by the specified deadline, this constitutes a non-compliance with permit condition 1.1.1(a).

However, NRW is aware that the operator's consultant is in the process of developing the required procedures. At the time of the inspection dated 15th of January 2026, these procedures had not yet been finalised or implemented and therefore remained outstanding.

ACTION: To develop and implement the waste storage procedures specified in this report within your Environmental Management System (EMS), in accordance with the requirements set out in the 'How to comply with your Environmental Permit' guidance.

A CCS Category 3 score has been issued in response to this non-compliance against permit condition 1.1.1(a) – General Management. This score reflects the operator's failure to develop and implement the waste storage procedures as

***requested in previous report,* CAR_NRW0049613 for the site visit that took place on the 5th of August 2025.**

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NRW Officers have previously raised concerns regarding the mixed waste that was stored up high on site. As can be seen in photograph 1. Mixed waste was stacked up high during our inspection the 15 January 2026.

Please note that best practice for waste storage requires waste to be stored in a stable and controlled manner. Stockpiles should be formed to an appropriate height, with consideration given to ground conditions and access for fire-fighting and site management. Waste should be stored neatly, with defined stockpile boundaries, and managed to prevent excessive build-up, over-stacking, or unsafe working conditions.

As stated within the Fire prevention and mitigation plans guidance, combustible waste should be stored to a '*Maximum stack height of 4 metres (or maximum of four bales high, whichever is lower) based on practical fire-fighting and stability considerations. The height of a stack should be taken as the longest measurement between the base of the stack and the top. If the ground is uneven this may not be the highest point'.*



Photograph 1 – Mixed waste stockpile exceeding FPMP recommended height limits.

NRW officers asked the operator during the inspection how the site manages its waste stockpiles to ensure that Fire Prevention and Mitigation Plan (FPMP) recommended maximum height limit of 4 metres is not exceeded. The operator confirmed that no process or control mechanism is currently in place to monitor or maintain stockpile heights in accordance with FPMP requirements.

NRW officers noted that the site does not currently have any system or controls in place to manage or monitor waste stockpile heights. This confirms that the site is failing to follow the

requirements set out in their FPMP. As stated in Section 11.3 – Management of wastes stored in stockpiles and containers of the sites FPMP, "*All stockpiles have visible markings or signage to denote waste stockpile heights and width to demonstrate compliance with the FPP and to make this clear and identifiable for operational staff.*"

No such visible markings, signage, or other height control measures were present during the site visit. As a result, the operator is currently unable to demonstrate compliance with the FPMP recommended maximum waste stack height of 4 metres or provide assurance that stockpiles are being actively managed in accordance with the plan.

***ACTION:* Ensure full compliance with the site's Fire Prevention and Mitigation Plan (FPMP) by implementing effective measures to manage and control waste stockpile heights. This must include establishing appropriate monitoring systems, visible height markers or signage, and any other controls required to ensure stockpiles do not exceed the maximum height limits specified in the site's FPMP and in line with NRW's Fire Prevention and Mitigation Plan Guidance. These controls must always be maintained and adhered to demonstrate compliance.**

A CCS Category 3 score has been issued in response to this non-compliances against permit condition 1.1.1(a) – General Management. This score is due to the site* not having *effective measures in place to manage and control waste stockpiles as specified in the site's FPMP.

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Following NRW's previous site visit on the 5 August 2025, concerns were raised in *CAR_NRW0049613* regarding the size of the wood waste stockpile which presented a fire hazard and, in the event of a fire, could result into an environmental pollution. During our visit on the 15 January 2026, NRW officers observed and noted that the wood waste stockpile has reduced as can be seen in photograph 2.



Photograph 2 – Reduced wood waste stockpile.

The reduction in the wood stockpile demonstrates a positive response to NRW's previous concerns, as identified during the site visit on 5 August 2025. The operator is reminded that stockpiles must continue to be actively managed and maintained within recognised best practice limits, including ensuring that storage heights remain below 4 metres at all times, in order to remain compliant with the Environmental Permit and fire prevention requirements.

***ACTION:* Continue to manage wood waste stockpiles to ensure that storage heights do not exceed 4 metres at any time. Ongoing monitoring and control measures should be implemented to prevent excessive accumulation and to ensure continued compliance with the Environmental Permit and Fire Prevention and Mitigation Plan requirements.**

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W1A - General Management

As stated in permit condition 1.1.4, *'The operator shall comply with the requirements of an approved competence scheme'.*

During the inspection, officers discussed the requirement for a Technically Competent Manager (TCM) to be present on site in accordance with the approved competence scheme. It was noted that the current Continuing Competence certificate held by Meurig Jones is due to expire on the 14th of February 2026. NRW officers reminded the operator of the importance of maintaining compliance by ensuring that all required refresher training and reassessments are completed before this expiry date. Failure to do so may result in the site operating without an appropriately qualified TCM, which would constitute a non-compliance with permit condition 1.1.4.

***ACTION:* To maintain compliance by ensuring that all required refresher training and reassessments are completed before the 14th of February 2026. Failure to do so may result in the site operating without an appropriately qualified TCM, which would constitute a non-compliance with permit condition 1.1.4. Once the Continuing Competence certificate has been successfully renewed, the operator must provide NRW with a copy of the updated certificate without delay.**

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W2C - Operating techniques

As stated in permit Condition 2.3.1 *"(a) For the following activities referenced in schedule 1, table S1.1 A1 to A2. The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the*

documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency".

As previously mentioned in *CAR_NRW0048596* and *CAR_NRW0045954*, *"table S1.1 states under A2 Transfer Station, "Treatment consisting only of manual sorting, separation, screening, baling, shredding, crushing or compaction of waste into different components for disposal, (no more than 50 tonnes per day) or recovery".*

During the inspection, officers noted that the BRUCE BWB recycling water bath was not in operation due to a reported mechanical breakdown, as can be seen in photograph 3. The operator confirmed that the water bath had been in use approximately three weeks prior to our visit. NRW has previously confirmed that the washing of waste is not an authorised treatment activity under the current site permit, and we advise you to cease all washing activities.



Photograph 3- BRUCE BWB Recycling Water Bath.

NRW understands that the operator has previously submitted a permit variation application to include the water bath within the authorised activities. This application was returned to you requiring further information. To progress this matter and bring the site back into compliance, the operator is required to re-submit a complete and fully supported permit variation application as soon as possible.

***ACTIONS:* The operator must cease all use of the BRUCE BWB recycling water bath until such time that the activity is formally authorised within the site's environmental permit.**

The operator is required to re-submit a complete and fully supported permit variation application to include the water bath within the permitted activities. This variation must be submitted as soon as possible.

A CCS Category 3 score was previously suspended in response to non-compliance

with permit condition 2.3.1(a), Operating Techniques. This suspension was applied on the basis that M O Jones would not use the wash bath until NRW has formally confirmed that the activity is permitted. However, as the wash bath was in active use during an inspection dated 15 June 2026, the suspended score will now be reinstated and recorded accordingly within this compliance update.

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W2D - The site

As Stated in Permit Condition 2.2.1 *"The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit"*.

Following previous site inspections, as stated in *CAR_NRW0045954* and *CAR_NRW0048596*, non-compliances were recorded for breaching this permit condition as waste was being stored beyond the permitted boundary.

During the inspection dated the 15 January 2026, Officers noted that waste continued to be stored beyond the permitted site boundary as can be seen in photograph 4. NRW advises that all waste should be removed that is currently being stored outside of the permitted area.



Photograph 4 – Waste being stored beyond the permitted boundary.

NRW understands that the operator's environmental consultant had recently submitted a permit variation application to amend the site boundary. However, this application was returned to you requiring further information.

ACTIONS: ***The operator must re-submit a complete and fully supported permit variation application as soon as possible to progress this matter and bring the site***

back into compliance.

Until such time that the variation is formally approved, the operator must immediately cease storing any waste beyond the permitted site boundary and any waste store beyond the site permitted boundary must be removed.

A CCS Category 3 score has been issued in response to this non-compliance against permit condition 2.2.1, The Site.

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W4A – Records

As stated in permit condition 4.1.1(a), *'All records required to be made by this permit shall be legible'.*

As a waste transfer station, the Duty of Care Code of Practice applies to your operations. During the inspection, NRW officers requested a range of duty of care documentation, and all requested paper copies were provided at the time of the visit. Following a review of this documentation, NRW officers identified the following duty of care mis-description issues:

- On the 13 January 2026, waste transfer notes records stated that 25.52 tonnes Trade refuse derived fuel (RDF) - EWC 19 12 12 was removed from the site. Following our conversation on the yard, it was confirmed that the correct waste classicisation as confirmed in the waste classification technical guidance WM3 for refuse derived fuel is in fact EWC 19 12 10 which confirms that the waste removed as EWC 19 12 12 was misdescribed.
- On the 17 September 2025, waste transfer note records stated that 20.16 tonnes of waste soil and rubble EWC 17 05 04 was removed from site Following our conversation on the yard, it was confirmed that this waste has been misdescribed. This waste stream is a mechanically treated waste arising from the screening of mixed wastes and in accordance with the waste classification technical guidance WM3, should be correctly classified as EWC 19 12 12: other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11.
- Prior to our visit on the 13 January 2026, NRW officers reviewed your quarterly waste returns. We observed that the amount of waste specified in quarter 1 (January to March) and quarter 2 (April to June) on your returns confirmed identical type and amount of waste and were removed from the site. Following our conversation on site, this was highlighted and confirmed by Peryf Ab Owain that this was an administrative error which will be reviewed.

ACTION: Ensure that all waste transfer notes and quarterly waste returns contain an accurate description of the waste, including all information that the operator is reasonably in a position to provide, to enable the lawful and safe handling, transport,

treatment, recovery, or disposal of the waste by subsequent holders. This must include the correct EWC code, waste type, physical form, any relevant characteristics, and any other details required to meet the Duty of Care Code of Practice. All future waste transfers must comply fully with these requirements.

A CCS Category 3 score has been issued in response to this non-compliance against permit condition 1.1.1(a), General Management.

Please see the link to further advice relating to Waste Duty of Care:Waste_duty_of_care_code_of_practice.pdf

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W1A - General Management

As stated in permit condition 1.1.1(a), *'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'.*

Waste transferred to an un-authorised facility.

Following the site visit on 15 January 2026, NRW reviewed the waste transfer notes provided by the operator. Due to the misdescription identified earlier in this report, NRW undertook a review of the site's 'Off-Site Transfers Procedure' within the Environmental Management System (EMS).

It states that, as part of the waste assessment process (waste matrix), *"duty of care information, including waste carrier licences and Environmental Permits for receiving sites,"* must be considered.

NRW has since reviewed the Environmental Permits for the receiving facilities and identified the following issues:

- The 20.16 tonnes of waste soil and rubble recorded as EWC 17 05 04 and removed from site on 17 September 2026 was misdescribed, as the correct classification for this waste is EWC 19 12 12 (other wastes, including mixtures of materials, from mechanical treatment of wastes other than those mentioned in 19 12 11). Due to this misdescription, the waste was transferred to a waste transfer site in Gwynedd, that is not permitted to accept EWC 19 12 12, meaning the waste was transferred to an unauthorised facility.
- The 25.52 tonnes of trade RDF recorded as EWC 19 12 12 and removed from site on 13 January 2026 was misdescribed. The correct classification for this waste is

EWC 19 12 10, and it was confirmed during the inspection that the waste was Refuse-Derived Fuel (RDF). As a result of this misdescription, the waste was transferred to a receiving site in Stoke-on-Trent that is not permitted to accept EWC 19 12 10, meaning the waste was transferred to an unauthorised facility.

***ACTION:* Ensure that all waste removed from the site is transferred only to an authorised person or facility. The operator must take all reasonable steps to verify that the receiving person or facility holds the appropriate environmental permit or exemption for the specific waste type being transferred. This includes confirming that the permit conditions explicitly allow the acceptance, treatment, recovery, or disposal of the correctly described waste.**

Transferring waste to facilities that are not appropriately permitted to accept the specific waste types constitutes an offence under Section 33(1)(a) of the Environmental Protection Act 1990, which prohibits the deposit of controlled waste except in accordance with an environmental permit.

A CCS Category 3 score has been issued in response to this non-compliance against permit condition 1.1.1(a), General Management.

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W1A - General Management

As stated in permit condition 1.1.1(a), *'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'.*

During our site visit dated 15th of January 2026, Peryf Ab Owain provided NRW Officers with copies of their waste sampling laboratory results. These laboratories results have since been reviewed and NRW have observed the following issues;

Quality protocol sampling.

- The laboratory report dated 10th of December 2025 provided by Professional Soil Laboratory (PSL) for the 'material' described as 6F5. Following a review of this report, we have observed not all the required aggregates quality protocol testing is completed. As stated in your sites Factory Production control manual, the following testing is required;
    - EN 933-1 - 1 per week/ every 500 tonnes
    - EN 1097-6 - 1 per month/ every 500 tonnes
    - EN 1097-2 - 2 per year/ every 500 tonnes

- EN 1744-1 - 1 per month/ every 500 tonnes
- EN 933-11 - 1 per month/ every 500 tonnes

It states on the results that EN 933-11 was the only testing carried out during this time.

Also as stated in the WRAP quality protocol guidance, further supplementary testing is required to meet Specification requirements, such as;

- 1377: part 4 – 1 per month
- 1377: part 2 – 1 per week
- 812: part 124 – 1 per year

It states on this report that 1377: part 2 was the only supplementary testing carried out during this time.

These tests do not satisfy the full sampling requirements of the WRAP quality protocol.

As stated within the WRAP quality protocol guidance, 'producers and users are not obliged to comply with the Quality Protocol. However, If they do not, the aggregate will be considered to be waste, and waste management controls will apply to its handling, transport and use'.

***ACTION:* Ensure that all required waste sampling and supplementary testing to produce end-of-waste quality aggregates is completed in full and in accordance with the site's Factory Production Control (FPC) Manual and the WRAP Quality Protocol. This includes undertaking all mandatory testing frequencies and supplementary tests specified within the relevant standards and guidance.**

The operator must ensure that these procedures are always followed and that sampling records, test results, and compliance evidence are maintained and made available to NRW upon request.

A CCS Category 3 score has been issued in response to this non-compliance against permit condition 1.1.1(a), General Management.

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WAC Sampling & Testing

- NRW have reviewed a WAC sample analytical report issued on 25 July 2025 (Report No. 25-038047) relates to the removal of 20.16 tonnes of waste recorded as 17 05 04 (soil and stones other than those mentioned in 17 05 03) on 17 September 2025. NRW confirmed that this waste was misdescribed and should have been classified as 19 12 12 (other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11).

  The waste was transferred to a waste transfer facility in Gwynedd, however, this site

is not permitted to accept waste correctly classified as 19 12 12 (other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11). Because the waste was sent to a waste transfer facility, the use of WAC testing was inappropriate, as WAC analysis applies only to waste destined for landfill. The site's EMS also confirms that mirror-entry wastes require full waste classification, not WAC testing.

This demonstrates that the sampling method used was not compliant with WM3 or the site's EMS.

- This point relates to the removal of 25.38 tonnes of 19 12 12 (other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11) from the site on 14 January 2026. The waste was transferred under recovery code R03.04.03 for RDF production.
- As the waste was again sent to a waste transfer facility, WAC testing was not suitable.

The analysis provided shows that WAC testing was carried out, but WAC cannot be used to determine whether a waste is hazardous or non-hazardous. Under WM3, WAC testing is used solely to assess landfill acceptability and does not provide the full chemical characterisation or hazardous property assessment needed for proper waste classification. Since the waste in this case was not being sent to landfill, the WAC results provide no meaningful classification value.

To determine whether the waste is hazardous, a WM3 waste characterisation analysis (a full hazardous waste classification suite) must be undertaken. This must identify and quantify all relevant substances so the waste can be assessed against hazardous property thresholds.
Mirror-entry wastes such as 19 12 11*/12 and 17 05 03/04* require a full basic characterisation, supported by a representative sampling plan, before a non-hazardous classification can be justified.

Using WAC alone for these wastes does not meet WM3 requirements and does not provide adequate classification.

ACTION:

- ***Ensure all waste sampling follows Appendix D of WM3 and your EMS procedures.***
- ***WAC testing must only be used for waste destined for landfill.***
- ***All other waste, particularly mixed waste or those sent for recovery, must undergo appropriate WM3-base classification, supported by a suitable sampling plan.***
- ***Review and update your procedures, ensure staff follow them, and maintain***

robust evidence of correct classification and sampling.

- ***Send a copy of your most up to date hazardous waste characterisation analysis (WM3 classification) for mirror entry waste stream to NRW.***

A CCS Category 3 score has been issued in response to this non-compliance against permit condition 1.1.1(a), General Management.

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NRW would like to thank Meurig, Rhiryd and Peryf 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.

"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".

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 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.