Compliance Assessment Report CAR_NRW0052210

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: 15/06/2026 between 12:45 and 14:45.

Parts of permit assessed: As below. .

NRW Lead Officer: Cheryl Griffiths, accompanied by Kieran Evans, Kevin Jones.

Report sent to: Meurig Jones, Director, 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
W2C - Waste - Operations - Operating techniques	C3 Minor	2.3.1(a)
W2C - Waste - Operations - Operating techniques	Action only (X)	
W2D - Waste - Operations - The site	C3 Minor	2.2.1
W3A(1) - Waste - Emissions and monitoring - Emissions to water	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
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
W2C	Cease operating the wash bath and must not recommence use of this activity until it has been formally authorised by NRW through the approval and issue of a permit variation.	29/01/2027

Criteria	Action needed	Complete by
W2C	Provide the requested information in relation to the Enviro Bulka plant on site.	11/10/2026
W2D	Cease the storage of any waste outside the permitted site boundary with immediate effect.	11/10/2026
W3A(1)	Provide the site's drainage plan and its final discharge point.	11/10/2026
W4A	Submit all the documents and information listed to NRW to enable a full assessment of compliance with the environmental permit.	11/10/2026

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

A routine site inspection was undertaken on 15 June 2026 to visit Mr M O Jones (Meurig Jones, the current 'operator'), at Melin Plas Du, Y Ffor, Pwllheli, Gwynedd, LL53 6RF by Natural Resources Wales regulating officers Cheryl Griffiths, Kieran Evans and Kevin Jones. During and following the inspection, NRW requested a number of documents and records to support the assessment of compliance from a staff member Peryf Ab Owain, who was present throughout the inspection.

A formal request for these documents, together with additional information, was also sent by email to the operator on 26 June 2026, with a deadline for submission to NRW of 13 July 2026. As of the date this report is sent to you, the requested information and documentation have not been received.

Once the outstanding information has been submitted and reviewed, NRW will determine whether a further CARS report is required to confirm the compliance assessment and any regulatory actions arising from the inspection.

The findings below reflect the aspects of compliance that were assessed during the inspection on 15 June 2026. This report also records the information request made to the operator and notes that the requested documentation remains outstanding at the time of writing.

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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."***

Following a number of site inspections, NRW officers have observed that the site is operating a BRUCE BWB recycling water-bath as a waste activity that is not currently authorised by the environmental permit (VP3494FK). During the inspection undertaken on 15 June 2026, the wash bath was observed in operation.

The previously suspended compliance score recorded in CAR_NRW0050506 will now be reinstated. This is because the wash bath remains unauthorised under the current environmental permit and therefore continues to be considered a non-compliance.

NRW acknowledges that the permit variation application has been re-submitted requesting authorisation to operate a small wash plant as a recovery activity prior to recycling. However, a review of NRW records confirms that this variation application has not yet been determined by our permitting department and NRW will only suspend compliance scores for a maximum period of six months.

As the wash bath is being operated prior to the approval and issue of the permit variation, the activity remains unauthorised. The operator is reminded that only waste operations expressly permitted under the environmental permit may be carried out on site.

Action: ***The operator must cease operating the wash bath and must only recommence use of this activity if it has been formally authorised by NRW through the approval and issue of a permit variation.***

A previous Category 3 CCS suspended score was reinstated against Permit Condition 2.3.1(a) – Operating Techniques following the operator's failure to achieve compliance within the required timescale specified in CAR_NRW0050506 following the site visit dated 15 January 2026. The operator has previously been advised in;

- **CAR_NRW0045954** ***dated 09/01/2025***
- **CAR_NRW0048596 dated 05/06/2025**
- **CAR_NRW0050506 dated 15/01/2026**

that operation of the wash plant is not authorised under the current permit, however, the activity continues. Although a permit variation application has been submitted, it has not yet and may not be authorised by NRW. Therefore, operation of the wash plant remains unauthorised and in breach of the permit.

Following the inspection dated 15 June 2026, NRW has assigned a Category 3 (C3) score against permit condition 2.3.1(a) – Operating Techniques. Although the operator has been given multiple opportunities to permit this activity through the permit variation process, the activity remains unauthorised. As NRW cannot defer compliance scoring indefinitely and scores will not normally remain suspended beyond six months, the breach has now been formally scored as a C3 non-

compliance

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Prior to the site inspection that took place on the 15 June 2026, NRW records identified that a number of U4 - *Burning Waste as Fuel in a Small Appliance* waste exemptions had been registered at this site between 24 November 2016 and 26 July 2025.

During the inspection, NRW officers discussed these exemptions with the operator. Following those discussions, NRW determined that further regulatory advice was required to establish whether an exempt waste activity could lawfully operate alongside the permitted waste operations undertaken at the site.

NRW subsequently reviewed the site's quarterly waste returns and noted that the accepted wood waste has not been reported as being recovered under recovery operation R1 – Use principally as a fuel or other means to generate energy. Instead, the wood waste has been reported as recovered under R3.04.02 – Mechanical reprocessing of wood (for recycling/energy recovery).

During the inspection, the operator advised that the purpose of the U4 exemption was to enable operation of the Enviro Bulka plant located on site which can be seen in the below photograph. NRW note that a further U4 waste exemption was registered at the site on 17 June 2026.



At present, the information available to NRW does not explain the nature of the activity being undertaken, the function of the Enviro Bulka plant, the waste inputs being used, or whether waste wood is being thermally treated on site. As a result, NRW is unable to determine the appropriate regulatory position or whether the activity is authorised by the existing U4, burning waste as fuel in a small appliance waste exemption.

Action: ***As requested in correspondence dated 26 June 2026, NRW requires the operator to provide further information to support this investigation, including:***

- ***The make and model of the Enviro Bulka plant and any associated boiler or***

combustion unit;

- ***The manufacturer's operating manual and technical specification;***
- ***A description and/ or process flow diagram showing how the plant operates;***
- ***Copy of the sites procedure on how to operate the Enviro Bulka;***
- ***Details of all inputs used within the plant;***
- ***Details of any outputs generated by the process, including heat, steam, ash or other residues;***
- ***Any records relating to the installation, operation, maintenance or servicing of the plant.***

NRW will review the information provided as part of its permit compliance assessment and determine the appropriate regulatory position.

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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 several site inspections noted in;

- CAR_NRW0050506 dated 15 January 2026

- CAR_NRW0048596 dated 5 June 2025

- CAR_NRW0045954 dated 9 January 2025

- CAR_NRW0043792 dated 14 March 2024

NRW officers have observed that the site is storing waste beyond the permitted site boundary. The operator stated that the waste observed during our site visit on the 15 June 2026, is excavated soil generated from the construction work taking place on site, and some WRAP quality protocol ‘product’.

The operator claims these materials are not classified as waste and do not fall under the storage requirements of the site environmental permit. However, as can be seen in the below photograph, NRW officers also observed a pile of waste which the operator was unable to confirm where it originated from.

The waste observed during this inspection appears to be mechanically treated mixed residual waste, comprising a mixture of inert material, wood, plastics, metals and other residual waste fragments. Based on visual inspection, the composition of the waste suggests that it has undergone some form of mechanical processing prior to deposition.



Please note, as stated within the WRAP quality protocol guidance, under sub heading 1.4.2, *'If Quality Protocol compliant material is mixed with waste materials, the resulting mix will be considered to be a waste and subject to waste management controls. If Quality Protocol compliant material is mixed with non-waste materials, the resulting mix will not, as a result, be waste'.*

Therefore the mixed waste stockpile observed during this inspection is subject to waste management controls and must be managed in accordance with the environmental permit and relevant waste legislation.

NRW acknowledges that the operator has submitted a permit variation application, which is currently awaiting determination by NRW's permitting department. As part of this application, the operator has requested an extension to the existing permitted boundary.

The previous Regulatory Officer served a statutory notice under Section 59ZB(2)(a) of the Environmental Protection Act 1990 on the 5 June 2025 requiring the removal of all waste being stored outside the permitted boundary. The operator subsequently complied with this notice and removed the waste from the affected area.

However, waste has since begun to re-accumulate beyond the permitted boundary, despite NRW having requested its removal on several occasions. While a permit variation application is currently being considered, the storage of waste outside the permitted boundary remains non-compliant.

Action: ***The operator must cease the storage of any waste outside the permitted site boundary with immediate effect and ensure that all waste is stored only within the currently permitted area. Any waste currently being stored beyond the permitted boundary must be removed and relocated to a compliant area within the site.***

Waste must not be stored beyond the permitted boundary unless and until NRW has formally approved the permit variation application and the permit has been duly varied to include the additional area.

NRW has assigned a Category 3 (C3) score against permit condition 2.2.1 (The Site), taking into account the ongoing permit variation application. However, waste was again observed beyond the permitted boundary during the inspection on 15 June 2026, despite formal enforcement action being taken for the same issue on 5 June 2025. Should the breach continue and the permit variation not be approved, NRW will consider an escalated enforcement response.

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W3A - Emissions and monitoring

Permit condition 3.1.1 states, *"Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions."*

During the site inspection on 15 June 2026, NRW officers observed that water from the BRUCE BWB recycling wash bath was escaping onto the surrounding ground and entering a nearby surface water drain.



In order to assess the potential environmental impact and determine compliance with Permit Condition 3.1.1, NRW requested further information from the operator by email on 26 June 2026, including details of the drainage connection and the final discharge point of the drain identified in the above photograph.

The requested information was due to be submitted by 13 July 2026. At the time of writing, NRW has not received a response from the operator. As a result, NRW has been unable to complete a full assessment of the drainage arrangement or determine whether the observed discharge has the potential to cause pollution.

Action: ***The operator must provide NRW with a copy of the site's drainage plan, clearly identifying the drainage network, the drain shown in the above photograph,***

and its final discharge point. This information must be submitted to NRW to enable a full assessment of compliance with Permit Condition 3.1.1.

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W4A – Records

As stated in permit condition 4.1.2, ***"The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency."***

As referenced earlier in this report, NRW requested a number of documents and information from the operator on 26 June 2026 to facilitate a full assessment of compliance with this permit condition. The requested information was to be submitted by 13 July 2026. The outstanding documents and information are listed below:

1. Duty of Care documentation (e.g. transfer notes) confirming glass, metal, paper, card, and plastic imported by the Council, and any two businesses in 2025/2026 to which you have provided segregated bin hire services for these waste streams (incoming waste).
2. Duty of Care documentation (e.g. transfer notes) confirming the above waste streams being removed from site. If waste has been sent to more than one site, please provide copies for each destination.
3. Duty of Care documentation (e.g. transfer notes) for 2025/2026 relating to upholstered waste/domestic seating (bulky waste), including sofas, sofa beds, armchairs, dining chairs, stools, footstools, office chairs, futons, bean bags, and cushions. During the visit, you explained that this waste is treated by separating wood and shredding textiles before both are sent for incineration. Please provide two example transfer notes for each waste stream, both incoming and outgoing.
4. Copies of transfer notes for waste code 19 12 10 removed from site in 2026.
5. Copies of transfer notes confirming the current destination(s) of waste code 19 12 12 removed from site in quarter two (April to June) 2026, which was previously sent to permit AB3494CM (as referenced in CAR_NRW0050506).
6. A copy of your most up-to-date hazardous waste characterisation analysis (WM3 classification) for mirror entry waste streams, as requested in CAR_NRW0050506.
7. The WRAP lab results mentioned during our site visit, provided by Blackburn Material Solutions.
8. A copy of the most recent sampling results taken from the BRUCE BWB recycling wash bath.

To date, the requested documentation has not been submitted to NRW. As a result, NRW has been unable to complete a full assessment of compliance against this permit condition.

Action: ***The operator must submit all the documents and information listed above to NRW to enable a full assessment of compliance with the environmental permit.***

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NRW would like to thank Meurig Jones and Peryf Ab Owain 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.