Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0052926

Permit being assessed: WP3599FY.

For: Five Lanes Transfer Station And H W R C, **held by:** SUEZ Recycling and Recovery UK Ltd

At: Caerwent, Caldicott, Monmouthshire, NP26 3AY.

Type of assessment: Site Inspection,

Reason: Incident Response (Incident number 2609250).

On: 18/08/2026 between 11:25 and 11:55.

Parts of permit assessed: Various.

NRW Lead Officer: Anna Andrews, accompanied by Carla Curtis, Taj Padam.

Report sent to: Darren Webb, Site Manager, on 24/09/2026.

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	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	Action only (X)	
W3A(1) - Waste - Emissions and monitoring - Emissions to water	Action only (X)	
W4A - Waste - Information - Records	Action only (X)	
W4A - Waste - Information - Records	Action only (X)	
W4B - Waste - Information - Reporting	Assessed (A)	
W4C - Waste - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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
W2D	Please provide NRW with a proposed timeline for the temporary storage measures, and the remediation works for the WTS.	25/10/2026
W3A(1)	Please submit the sampling data from the water discharge from the interceptor for review.	30/11/2026
W4A	Please provide an up-to-date FPMP to NRW.	30/11/2026
W4A	Please consider clearly documenting the inspection of drainage of infrastructure on your inspection records, together with any maintenance requirements or corrective actions identified.	30/11/2026

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 details the site visit made on 18 August 2026 to Five Lanes Transfer Station and HWRC for an unannounced site inspection following a fire (incident reference WIRS 2609250) at site on 17 August 2026. Natural Resources Wales (NRW) officers Anna ANDREWS, Carla CURTIS, and Taj PADAM arrived at Five Lanes, Caerwent, Caldicot, NP26 3AY at 11:25 am and met with the Site Manager. Weather conditions were overcast and still at the time of inspection.

Incident Response

Incident reference WIRS 2609250: "Reporter stated that FRS crews are in attendance at Five Lanes waste disposal site on the A48 between Tabernacle Church and Crick, Caerwent NP26 3AU. Reporter stated that one of the bays has a large amount of industrial waste alight.

The contractors who operate the site are at the scene helping to move waste.

FRS crews have requested NRW attendance at the scene asap. Group Manager EVANS is the on site contact but no telephone number known for him - contact via FRS control room.

FRS incident ref – 47331"

Permit Breaches and Actions

W2D The Site (Action Only):

Due to the fire damage of the waste transfer station (WTS) building, Five Lanes Transfer Station and HWRC has imposed temporary storage measures on-site for waste that was stored in the WTS building, as agreed by NRW.

Action only: Please provide NRW with a proposed timeline for the temporary storage measures, and the remediation works for the WTS by 25 October 2026.

W3A(1) Emissions to water (Action Only):

The Environmental Manager advised that samples have been taken from the interceptor discharge to assess compliance with the conditions of discharge permit AN0240601.

Action only: Please submit the sampling data from the water discharge from the interceptor for review by 30 November 2026.

W4A Records (Action Only):

Due to the fire incident on-site, the Fire Prevention and Mitigation Plan (FPMP) needs to be reviewed and updated.

Action only: Please provide an up-to-date FPMP to NRW by 30 November 2026.

W4A Records (Action Only):

The inspection checklist does not clearly demonstrate whether drainage infrastructure was inspected as part of the routine inspection programme.

Action only: Please consider clearly documenting the inspection of drainage of infrastructure on your inspection records, together with any maintenance requirements or corrective actions identified by 30 November 2026.

Site Inspection Observations

Officers were shown around the waste transfer station (WTS) where the fire occurred. The fire started at approximately 5:30 am on 17 August 2026 and was detected by the site's thermal imaging cameras in the general waste bay in the WTS, which subsequently alerted the emergency services. South Wales Fire and Rescue Service (FRS) has since indicated that the fire was caused by waste electrical and electronic equipment (WEEE) containing a lithium battery.

Officers were informed that the drainage on-site will be cleaned, and the resulting water, as well as any remaining water will be collected via the interceptor and removed from site by tanker to the appropriate waste facility.

The Site Manager explained that the waste storage area affected by the fire will remain out of use pending inspection and sign-off by structural engineers to confirm that it is safe to re-enter and use in operations (see images 1 and 2).



Images 1 and 2: Left – General waste storage bay affected by the fire. Right – Damaged roof of the waste transfer station (WTS).

The thermal imaging cameras were destroyed during the fire. The Site Manager explained that the site are considering employing G4S security personnel to undertake overnight monitoring of the waste bays until the thermal cameras are replaced. Officers departed the site at 11:55 am.

Records, Reporting, and Notifications

Following the incident site inspection on 18 August 2026, officer Anna ANDREWS requested information regarding site operating procedures, drainage infrastructure, and the relevant waste transfer notes (WTNs) for waste affected by the fire. Thank you for working with NRW officers to ensure that the FRS incident of 17 August 2026 was fully understood.

During the incident response, several queries were raised regarding site drainage due to the observed flow of water by the NRW officer in attendance during the FRS incident. Thank you for informing NRW that all site drainage has been fully cleaned and jetted and the foul drainage system for the transfer station building and external bays to the foul water storage tank is now fully functional since the site visit. NRW has also been informed that the site intends to undertake a full drainage survey, following which updated drainage drawings will be produced and submitted to NRW.

Thank you for also providing documentation demonstrating that the site drains were cleared of a blockage on 1 December 2025 and that the interceptor was emptied on 4 March 2026. Please continue to maintain this infrastructure in accordance with the '*Site and Equipment Maintenance Plan'* which requires the drainage to be cleaned every 6 months.

The site has provided WTNs demonstrating the removal of 232.74 tonnes of fire-affected waste. A total of 58,430 litres of fire water and wastewater was also removed from the site, comprising 12,000 litres on the day of the incident and a further 46,430 litres between 18 August 2026 and 26 August 2026. The Environmental Manager advised that a significant quantity of fire water was likely absorbed by the general waste. Any discharge observed by NRW officers during attendance on 17 August 2026 was permitted under discharge permit AN0240601. The Environmental Manager also advised that samples have been taken from the interceptor discharge to assess compliance with the conditions of discharge permit AN0240601. However, the waste sampling data has not yet been provided to NRW due to laboratory service disruption. Please submit the sampling data as soon as reasonably

practicable for review.

The site has also provided the most recent internal site inspection report undertaken in accordance with the '*Site Operations Plan'*. However, the inspection checklist does not clearly demonstrate whether drainage infrastructure was inspected as part of the routine inspection programme. Please consider clearly documenting the inspection of drainage of infrastructure on your inspection records, together with any maintenance requirements or corrective actions identified.

Since the FRS incident, the Site Manager has informed NRW that Monmouthshire County Council has requested that the site utilises one of its external bays for the storage of cardboard. NRW has accepted this as a temporary storage measure. Please provide NRW with a proposed timeline for the temporary storage measures, and the remediation works for the WTS.

Fire Prevention and Mitigation Plan (FPMP)

Five Lanes Transfer Station and HWRC have a FPMP, reviewed in May 2023 following an FRS incident on 27 March 2023.

The companies Environment Manager has informed NRW that the FPMP is going to be reviewed again following this FRS incident by 30 November 2026. Please provide an up-to-date FPMP to NRW by 30 November 2026. They have also informed NRW officers that the 'Fire Pack' has been reviewed to ensure that information is readily available to emergency services, such as the drainage plan.

WAMITAB

The site has a TCM with a valid WAMITAB certificate with an expiry date of the 27 October 2027.

Waste Returns

Five Lanes Transfer Station and HWRC have no outstanding waste returns.

Contact Details

If you have any queries regarding this Compliance Assessment Report (CAR) please contact Dr Anna Andrews at anna.andrews@cyfoethnaturiolcymru.gov.uk.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

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.