Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0053141

Permit being assessed: EP3698FL.

For: Nantycaws H C I Transfer & Treatment Facility, **held by:** CWM Environmental Ltd

At: Nantycaws Landfill Site, Llanddarog Road, Nantycaws, Carmarthen, Carmarthenshire, SA32 8BG.

Type of assessment: Site Inspection,

Reason: Routine.

On: 26/06/2026 between 10:00 and 11:00.

Parts of permit assessed: Compost facility.

NRW Lead Officer: Daniel Packer, accompanied by Michael Launder.

Report sent to: Site Manager, Site Manager, on 05/10/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3I - Installations - Emissions and monitoring - Fire	C3 Minor	3.7.1
IR3I - Installations - Emissions and monitoring - Fire	C3 Minor	5.18
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR3I - Installations - Emissions and monitoring - Fire	C3 Minor	5.18

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

Total non-compliances recorded	Total non-compliance score
4	16

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
IR3I	Ensure there is atleast one designated area clear for use at all times. Quarantine area must be identified on FPP and	16/10/2026

Criteria	Action needed	Complete by
	SOP	
IR3I	Ensure oversize material is stored in compliance of the Fire Prevention Management Plan Guidance.	16/10/2026
IR1A	Ensure green waste is stored in compliance of the approved SOP	16/10/2026
IR3I	Ensure green waste storage is compliant with Fire Prevention and Management Plan Guidance. No combustable wastes are stored for more than 6 months.	16/10/2026

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

1.Purpose of Visit

The visit was undertaken as a routine regulatory inspection to observe site operations, assess compliance with environmental permit requirements, and discuss operational controls with site management.

Note, the site inspection was carried out on the 26th of June 2026 and the photos and information below depict what was observed on this date. However, NRW has had a subsequent meeting with the operator Cwm on 15ht July 2026 who has provided some further information and clarification on some of the issued raised and is also noted below.

2.0 Site Observations

2.1 General Site Condition

The site was operational at the time of the visit. Overall housekeeping standards were variable across the site. Some areas appeared organised; however, significant volumes of material were noted in operational areas.

2.2 Composting Operations

- Active composting and shredding activities were ongoing at the time of inspection.
- Fresh green waste was being shredded in an area occupied by both a shredder and a digger.

- Separate piles of green waste and shredded material were observed within this area.

2.3 Quarantine Area

NRW officers asked the Site Manager to identify the designated quarantine area.

- The Site Manager identified the area currently being used for shredding operations as the quarantine area.
- NRW observed that this area was actively in use for shredding at the time of the visit and contained multiple piles of green waste and processed material.
- As a result, NRW determined that this area was not available or suitable for use as a quarantine area.
- Additionally, this area is not identified on the approved FPP as a quarantine area.

NRW conclusion:
There is currently no clearly defined or usable quarantine area on site, as required by permit conditions.



Figure 1 Photo showing quarantine area with equipment and shredding taking place.

Compliance - breach of permit condition 3.7.1 for failing to comply with the FPP as there is no freely available quarantine area.

This breach has been assigned a non-compliance category of C3 under compliance criteria IR3I Fire.

Please note the Fire Prevention and Mitigation Plans guidance states - *You must set out in your plan the location of the quarantine area and the volume of waste that it can hold. The quarantine area should be within the permitted boundary area of the site and during an incident should be large enough to both:*

- *hold at least 50% of the volume of the largest stack*
- *have a separation distance of at least 6 metres around the quarantined waste (this can be decreased if concrete bunkers/walls will be used)*

For operational reasons you may want to keep the location of the quarantine area flexible. If so, you should identify on your site plan all the areas you could use.

You should always keep at least one designated quarantine area clear, unless it is being used in the event of a fire.

Note – this was discussed in the subsequent meeting referenced above. Cwm to amend site layout plans on SOP and FPP to clearly depict accurate site layout, working areas, infrastructure and quarantine areas that is realistically achievable onsite within the space available.

2.4 Oversized Material

- NRW observed a significant accumulation of oversized material present on site.
- The volume of oversized material was considered to be extremely large.

The Site Manager stated:

- That an outlet is in place for the removal of oversized material.

However:

- When asked to provide a timeframe for removal of the stockpiled oversized material, the Site Manager was unable to provide an estimate.

Note – this was discussed in the subsequent meeting referenced above. CWM advised that upon completion of the legacy green waste processing programme, they expect a significant reduction in the oversize stockpile.

CWM estimated that processing and removal of all legacy green waste could reduce the oversize stockpile by at least 50%.

CWM advised that they are actively seeking sustainable outlets for the oversize material.

At present, material is being sent to Manchester. However, CWM stated that this arrangement is not commercially viable as a long-term solution and that alternative outlets will need to be identified.

NRW discussed the importance of identifying sustainable and compliant outlets to support stock reduction and long-term compliance.



Figure 2 Photo showing oversize material stock pile.



Figure 3 Photo showing over size material stock pile.

Compliance – The oversize material is being stored out of compliance with the requirements of the Fire Prevention Management Plan Guidance document in relation to height of the storage stack (well over 4 metres high). The approved FPP also states under section 5.18 in relation to green waste and stockpiles, that no combustible wastes are stored for more than 6 months and ordinarily no more than 3 months, this amounts to a further breach of permit condition 3.7.1 for failing to comply with the FPP.

This breach has been assigned a non-compliance category of C3 under compliance criteria IR3I Fire.

2.5 Plastic Contaminated Waste

- NRW noted that the stockpile of plastic contaminated waste has recently been reduced in volume.
- It is estimated that approximately 1-1.5 lorry loads remain on site.
- The operator confirmed that the remaining material is scheduled for removal shortly.

Operator to send NRW the waste transfer notes confirming the removal of this material.



Figure 4 Photo showing plastic contaminated waste pile, next to oversize material stock pile.

2.6 Fire Breaks and Stockpiles

- NRW observed that fire breaks between legacy green waste stockpiles have been increased in size.
- There were four legacy green waste piles remaining on site.
- All piles were observed to be non-compliant, with large, steep, square-sided faces exceeding suitable height and profile requirements.
- At the time of inspection, legacy green waste stockpiles were located in close proximity to newly formed active windrows.
- NRW observed visible cross-contamination, with liquid runoff from legacy green waste entering adjacent active windrows.

NRW position:
Whilst improvements to fire break spacing were noted, NRW remains concerned regarding:

- The effectiveness of the fire breaks due to the risk of collapse from steep-sided stockpiles

- The positioning of legacy material in close proximity to active composting areas
- The potential for contamination of active windrows through uncontrolled runoff



Figure 5 Photo showing fire break between legacy green waste stockpile, with steep sides.



Figure 6 Photo showing fire break between legacy green waste stockpiles with steep sides.



Figure 7 Photo showing legacy green waste stock pile to the right of the photo, with run off into the windrow on the left of the photo.

Compliance - The approved version of the SOP states that green waste for composting will have a maximum duration of 95 days onsite before being processed. The legacy green waste feedstock pile has been present onsite for a period exceeding this timeframe.

This is a breach of permit condition 1.1.1 due to being a failure to operate activities in accordance with a document mentioned in the EMS.

NRW notes that a revised SOP has been received, however, they have not yet undergone full review or received approval. Any amendments to SOPs must continue to reflect the requirements applicable to the permitted site, including relevant BAT conclusions, PAS requirements, NRW Guidance Note 16 (GN16) Fire Prevention and Mitigation Plans (FPMPs), permit conditions, and any other applicable regulatory obligations.

This breach has been assigned a non-compliance category of C3 under compliance criteria IR1A General management.

Similarly, the FPP states under section 5.18 in relation to green waste and stockpiles, that no combustible wastes are stored for more than 6 months and ordinarily no more than 3 months, amount to another breach of permit condition 3.7.1 for failing to comply with the FPP.

This breach has been assigned a non-compliance category of C3 under compliance criteria IR3I Fire.

2.7 Fire Water Provision

- The HSE Manager confirmed that a new coupling has been ordered and is expected to be delivered to site next week. This will allow the water storage tank located outside the front of the

MRF unit to be utilised for firefighting purposes in the event of a fire at the composting facility.

- The HSE Manager also confirmed that access to the water lagoon located adjacent to the composting facility has been improved to enable its use in the event of a fire on site.

2.8 Site Infrastructure and Drainage

NRW requests clarification if the newly dug drainage run located to the rear of the composting pad is within the permitted site boundary.

2.9 Proposed Site Layout Changes

The Site Manager informed NRW that there are plans to change the layout of the site. The proposed changes include:

- Locating green waste stockpiles on the southern side of the site and locating active windrows and finished compost product to the northern side
- The Site Manager advised that implementation of this layout will take some time to complete and be dependent upon the removal of the remaining legacy green waste stockpiles

Note – this was discussed in the subsequent meeting referenced above. CWM advised that the site is currently constrained by available operational space. To address this, CWM stated that it intends to reduce fresh green waste inputs by approximately 50% in order to create additional space for processing and removing legacy material.

3.0 Summary

The site visit identified concerns in relation to:

- Lack of a clearly defined and usable quarantine area
- Significant accumulation of oversized material without a defined removal timeframe
- Non-compliant legacy green waste stockpiles with steep faces
- Uncertainty regarding the effectiveness of fire breaks due to collapse risk
- Proximity of legacy waste to active windrows, resulting in observed cross-contamination
- Uncertainty regarding whether newly installed drainage infrastructure is within the permitted boundary

4.0 Actions / Follow-Up

Cwm Environment Ltd is expected to:

1. **Quarantine Area**
    - Clearly define and maintain a dedicated quarantine area that is available at all times and not used for routine processing activities.

2. **Oversized Material**
    - Provide a clear plan and timeframe for the removal or processing of the oversized material currently stockpiled on site.
    - Ensure stockpiles are managed in accordance with permit limits and good practice.
3. **Plastic Contaminated Waste**
    - Complete the removal of remaining plastic contaminated waste in line with the operator's commitment.
4. **Fire Breaks and Stockpile Management**
    - Re-profile legacy green waste stockpiles to reduce height and remove steep, vertical faces.
    - Ensure fire breaks are effective, accessible, and not at risk of being compromised by material collapse.
5. **Separation of Waste Streams**
    - Ensure adequate separation between legacy waste and active windrows.
    - Prevent runoff from legacy materials entering active composting areas.
6. **Drainage Infrastructure**
    - Provide confirmation of the location of the newly installed drainage run relative to the permitted boundary.
    - Where necessary, supply site plans or drawings to demonstrate compliance with permit requirements.

Additional agreed actions from Cwm meeting:

1. Provide NRW with quantified figures for the volume of legacy green waste currently present on site.
2. Provide NRW with evidence for the assessment of suitability and testing of the quality of the legacy green waste currently on site and how this is to be used such as blend ratios etc.
3. Provide NRW with quantified figures for the volume of legacy green waste processed during the previous 12 months.
4. Submit a detailed plan showing how CWM intends to achieve full permit compliance by 31 March 2027.
5. Include within the plan:
    - Quantified stock reduction targets;
    - Processing and removal rates;
    - Key actions required to achieve compliance;

- Milestone targets at two-month intervals through to March 2027.

6. Provide NRW with quantified figures for the volume of oversize material currently present on site.
7. Provide NRW with further details of an outlet for the oversize material on size to reduce in volume to achieve full permit compliance.
8. Identify contingency measures that will be implemented should progress fall behind programme.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores
The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?
In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management
- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations
- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring
- IR3A(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information
- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response
Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice
You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line
If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

Disputing the Content of this Compliance Assessment Report Form
If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales

Concerns Not Related to the Content of this Compliance Assessment Report Form
If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone**: 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email**: enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone**: 0300 790 0203
- **Email**: ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.