Compliance Assessment Report CAR_NRW0052914

Permit being assessed: ZP3695VH.

For: Refail Newydd, **held by:** Humphreys Waste Recycling Ltd

At: Caergeiliog, Holyhead, Gwynedd, LL65 3DX.

Type of assessment: Site Inspection,

Reason: Incident Response (Incident number 2609006).

On: 09/09/2026 between 10:50 and 12:00.

Parts of permit assessed: As Below. .

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

Report sent to: Cai Humphreys , Technical Competent Manager. , on 07/10/2026.

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	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W2D - Waste - Operations - The site	Action only (X)	
W3C - Waste - Emissions and monitoring - Odour	Action only (X)	
W3G - Waste - Emissions and monitoring - Fire	C3 Minor	3.4.1.

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

Total non-compliances recorded	Total non-compliance score
1	4

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	Ensure the site operates in accordance with its Environmental Management System at all times, including the completion of daily site inspection records to monitor and control odours that may affect receptors beyond the site boundary.	29/11/2026
W1A	Develop, implement and maintain a documented weather contingency plan within the Environmental Management System. The plan should identify potential operational and environmental risks associated with adverse weather conditions, including prolonged high temperatures, heavy rainfall and strong winds, and detail the measures that will be taken to minimise the risk of pollution and maintain effective environmental controls.	11/01/2027
W1A	To submit a copy of the weather contingency plan to NRW once it has been incorporated into the Environmental Management System.	12/01/2027
W2D	The operator must ensure that all waste activities undertaken under Environmental Permit ZP3695VH remain within the permitted site boundary at all times. If the operator intends to undertake any permitted waste activity beyond the permit boundary, a permit variation must be obtained from NRW before such activities commence.	29/11/2026
W3C	The operator must continue to implement the Odour Management Plan and undertake routine odour monitoring in accordance with the procedures set out within the Environmental Management System. Particular consideration should be given to periods of hot weather or other conditions that may increase the risk of odour generation and off-site impacts.	29/11/2026
W3G	Ensure all combustible waste is stored in accordance with the approved FPMP at all times, including maintaining the required 1 metre freeboard at the top of an enclosed waste bays.	29/11/2026

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

A site inspection was undertaken by Natural Resources Wales (NRW) Regulatory Officers Cheryl Griffiths and Kieran Evans on 9 September 2026 at Humphreys Waste Recycling Ltd at Refail Newydd, Caergeiliog, Holyhead, Anglesey, LL65 3DX.

The inspection was carried out in response to an odour complaint received by NRW on 11 and 27 of August 2026. The purpose of the visit was to assess compliance with relevant environmental permit conditions, with particular focus on the management and control of odour emissions.

During the inspection, NRW officers reviewed site operations and discussed management procedures with site representatives. To support the compliance assessment, a number of documents and records were requested from the operator.

A formal request for these documents was issued by email on 9 September 2026. The requested documentation, including updated management system documents and operational records, was subsequently submitted to NRW on 2 October 2026.

The findings set out within this Compliance Assessment Report reflect the permit conditions assessed during the inspection, together with consideration of the information and records provided by the operator following the visit.

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W1A - General considerations

As stated in permit condition 1.1.1, ***"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 the odour complaint received by NRW, a site inspection was undertaken on 9 September 2026. The inspection focused on compliance with permit condition 1.1.1(a) and included a review of the site's Environmental Management System (EMS), specifically the arrangements in place for odour management, monitoring, and the investigation of complaints.

Prior to the inspection, NRW officers reviewed the site documentation held on file, including the EMS procedures relating to site inspections and odour management. The version available to NRW at the time, dated 01 August 2025, was reviewed. During discussions on site, the site's Technically Competent Manager (TCM) advised that a newer version of the EMS was in place. NRW requested a copy of the updated document by 28 September 2026. As the updated EMS had not been received at the time of the inspection, NRW's initial assessment was based on the version dated 01 August 2025. The updated EMS was

subsequently submitted to NRW on 2 October 2026 and has been reviewed as part of this assessment.

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Section 4.5.5 of the updated EMS, Monitoring and Control of Odour, states:

"The site will be monitored daily as part of the site checks for the presence of odours. These checks are recorded on the daily inspection sheet (see Appendix II)."

During the inspection, NRW officers discussed the daily inspection process with the site's TCM and requested copies of the completed daily inspection sheets for the weeks commencing 10 August 2026 and 24 August 2026. The requested records were subsequently provided to NRW via email on 2 October 2026.

NRW reviewed the inspection records and noted that both sets of daily inspection sheets recorded that no odours were detected beyond the site boundary during the relevant periods.

NRW has also taken into consideration the local weather conditions at the time the complaint was received. The complaint was reported during a period of exceptionally high temperatures across Wales, which formed part of a significant heatwave experienced during August 2026. Such weather conditions have the potential to increase the generation, and perception of odours associated with waste management activities.

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NRW's How to Comply with Your Environmental Permit guidance states:

"Severe weather (for example wind, flooding, drought and snow) can have serious implications for waste operations. If the ability to operate your business or manage your waste can be affected, then you must ensure you have a written contingency plan as part of your management system."

Following review of the updated EMS submitted to NRW on 2 October 2026, NRW was unable to identify a documented contingency plan addressing severe weather events and the potential impacts these conditions may have on site operations, including the increased risk of odour generation and nuisance.

Whilst no odour issues were identified during the inspection, NRW recommends that the Environmental Management System is updated to include a documented weather contingency plan. Such a plan would help ensure that potential operational and environmental risks associated with adverse weather conditions are identified and managed effectively should they occur.

Actions:

- ***Ensure the site operates in accordance with its Environmental Management System at all times, including the completion of daily site inspection records to monitor and control odours that may affect receptors beyond the site boundary.***
- ***Develop, implement and maintain a documented weather contingency plan***

within the Environmental Management System. The plan should identify potential operational and environmental risks associated with adverse weather conditions, including prolonged high temperatures, heavy rainfall and strong winds, and detail the measures that will be taken to minimise the risk of pollution and maintain effective environmental controls.

- ***To submit a copy of the weather contingency plan to NRW once it has been incorporated into the Environmental Management System.***

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

Prior to the inspection, NRW officers were unable to locate a copy of the current Technically Competent Manager (TCM) continuing competence certificate for the appointed TCM on NRW records. To enable NRW to complete its assessment of compliance with Permit Condition 1.1.4, the operator was requested to provide a copy of the most up-to-date certificate. A copy of the continuing competence certificate was subsequently submitted to NRW on 2 October 2026.

NRW has reviewed the certificate provided and is satisfied that the appointed TCM holds a valid certificate demonstrating continuing competence in accordance with the requirements of the approved competence scheme.

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W2D - The site

As stated in permit condition 2.4.1, ***"The activities shall not extend beyond the site, being the land shown edged in green on the site plan attached to the permit".***

During the inspection, NRW officers observed a Humphreys Waste Recycling Ltd vehicle carrying a roll-on roll-off (RoRo) skip containing wood waste parked in the yard opposite the permitted site boundary (Photograph 1).



Photograph 1 - RoRo skip containing wood waste in yard opposite the permitted site.

After the inspection, the site's Technically Competent Manager (TCM) confirmed that the waste observed outside the permit boundary remained in transit and had not been deposited. NRW found no evidence of waste being stored outside the permitted area duirng the inspection, however, the operator is reminded that all activities regulated by Environmental Permit ZP3695VH must be carried out within the permit boundary. Any activities beyond the permitted area would require a permit variation.

NRW's pre-application advice service is available to provide guidance on permit variations and other permit-related queries.

Action: ***The operator must ensure that all waste activities undertaken under Environmental Permit ZP3695VH remain within the permitted site boundary at all times. If the operator intends to undertake any permitted waste activity beyond the permit boundary, a permit variation must be obtained from NRW before such activities commence.***

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W3C - Odour

As stated in permit condition 3.2.1, ***"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable, to minimise, the odour"****.*

Upon arrival at the site, NRW officers did not detect any significant odour beyond the site boundary. A slight odour was noted within the site boundary, however, this was not considered unusual given the nature of the permitted waste activities being undertaken.

NRW has also taken into account the weather conditions at the time the complaint was received. The complaint coincided with a period of prolonged exceptionally high temperatures across Wales, which may have increased the potential for odour generation and odour perception from waste management activities.

As detailed above in this report, NRW reviewed the site's daily inspection records for the weeks commencing 10 August 2026 and 24 August 2026. The records indicated that no odours were detected beyond the site boundary during the periods reviewed.

A copy of the site's Odour Management Plan (Version 2) was submitted to NRW on 2 October 2026. The plan sets out the measures in place to prevent and minimise odour emissions, including routine odour monitoring, site inspections, and consideration of weather conditions that may influence odour generation and dispersion.

Based on observations made during the inspection and the information reviewed, NRW did not identify evidence of permit condition 3.2.1 being breached at the time of the visit.

Action: ***The operator must continue to implement the Odour Management Plan and undertake routine odour monitoring in accordance with the procedures set out within the Environmental Management System. Particular consideration should be given to periods of hot weather or other conditions that may increase the risk of odour generation and off-site impacts.***

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W3G - Fire

As stated in permit condition 3.4.1, "*The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance".*

During the inspection, NRW officers observed that the combustible waste stockpile was being stored within the maximum pile height of 4 metres, in accordance with the site's Fire Prevention and Mitigation Plan (FPMP). However, NRW also observed that the required freeboard space was not being maintained within the enclosed waste bay (Photograph 2).

Following the inspection, a copy of the site's FPMP was submitted to NRW on 2 October 2026. Under the section titled "Enclosing piles using bays and walls", the FPMP states:

"A freeboard space at the top and sides of the walls will be physically retained at all times in accordance with the latest available guidelines through providing the operator with markers and giving them instructions whilst giving them the toolbox talk and physically showing them how to leave a freeboard space at the top and on the sides of the walls."

The current NRW Fire Prevention and Mitigation Plan guidance requires a minimum freeboard of 1 metre to be maintained at the top and sides of enclosed waste bays. At the time of the inspection, NRW officers observed that this freeboard was not being maintained for combustible waste stored within the bay.

Failure to maintain the required freeboard means the waste was not being stored in accordance with the site's approved FPMP and therefore represents a breach of Permit Condition 3.4.1.



Photograph 2 - Combustible waste storage not in accordance with FPMP freeboard requirements.

Action: ***Ensure all combustible waste is stored in accordance with the approved FPMP at all times, including maintaining the required 1 metre freeboard at the top of an enclosed waste bays.***

A Category 3 (C3) non-compliance has been identified against Permit Condition 3.4.1. Although the waste stockpile height was observed to be within the permitted limit, the required 1 metre freeboard was not being maintained within the enclosed bay as specified in the site's approved FPMP and current NRW guidance.

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NRW would like to thank Humphreys Waste Recycling Ltd 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.