Compliance Assessment Report CAR_NRW0052874

Permit being assessed: QP3294FQ.

For: Cymru Lan, **held by:** Cymru Lan Cyfyngedig

At: Plot 4, Gaerwent Industrial Estate, Gaerwen, Ynys Mon, LL60 6HR.

Type of assessment: Site Inspection,

Reason: Routine.

On: 03/09/2026 between 13:25 and 14:00.

Parts of permit assessed: As below. .

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

Report sent to: Christopher Bennett, Director, 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	C3 Minor	1.4.1
W1A - Waste - Management - General management	Action only (X)	
W2E - Waste - Operations - Waste acceptance	C3 Minor	1.2.1
W3C - Waste - Emissions and monitoring - Odour	Action only (X)	
W3C - Waste - Emissions and monitoring - Odour	Action only (X)	
W3C - Waste - Emissions and monitoring - Odour	Action only (X)	
W4A - Waste - Information - Records	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
W1A	If the operator or any tenant intends to undertake any additional waste activities that are not currently authorised by the Environmental Permit, the operator must apply for and obtain a variation to the permit from NRW before commencing those activities.	30/10/2026
W1A	The operator must ensure that the temporary Technically Competent Manager (TCM) remains in place and provides the required level of technical competence until the nominated TCM has successfully completed their Continuing Competence assessment. A copy of the Continuing Competence certificate must be submitted to NRW upon completion.	30/10/2026
W1A	Whilst the temporary TCM is in place, the operator must ensure that they attend the site for a minimum of one hour per week, and that each visit is recorded in the site diary.	30/10/2026
W2E	The operator must ensure that any activities undertaken within the permitted boundary, including those carried out by third parties renting, comply with all requirements of the environmental permit.	30/10/2026
W3C	The Site Manager and/or a nominated supervisor shall undertake and record odour monitoring at the site boundary a minimum of twice daily while the site is operational.	30/10/2026
W3C	Monitoring results, together with any corrective actions taken in response to odour issues, shall be recorded in the site diary and made available for inspection by NRW upon request.	30/10/2026
W3C	Provide NRW with a copy of the current Odour Management Plan and any associated Odour Action Plan for review.	30/10/2026
W4A	Ensure that all future waste transfer notes include the correct List of Waste (LoW) / European Waste Catalogue (EWC) code for the waste being transferred, in accordance with the Waste Duty of Care Code of Practice.	30/10/2026
W4A	The operator must continue to submit quarterly waste returns to NRW within the timescales specified by the permit. The operator must also ensure that all information contained within the returns, including waste types and quantities of waste accepted and removed from the site, is recorded accurately and is supported by site records.	30/10/2026

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 site inspection was undertaken on 3 September 2026 at Cymru Lan Cyfyngedig at Plot 4, Gaerwen Industrial Estate, Gaerwen, Anglesey, LL60 6HR by Natural Resources Wales regulating officers Cheryl Griffiths and Kieran Evans. During and following the inspection, a number of documents and records were requested from the operator to support the assessment of compliance.

On 4 September 2026, a formal request for these documents and additional information was sent to the operator by email, with a submission deadline of 9 September 2026. The operator provided the requested information on 7 September 2026.

The findings below reflect the aspects of compliance that were assessed during the inspection.

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W1A - General considerations

As permit condition 1.1.1 states, *'No waste management operations shall be authorised by this licence unless:*

a) specified in and undertaken in accordance with the limitations in section 1.1 of the working plan and in the following table; or

b) otherwise required by the conditions of this licence as being an integral part of the specified waste management operations'.

During the visit, NRW officers assessed the waste management activities being undertaken on site against the specified waste management operations listed in table 1.1 within the environmental permit. It was observed that the site was bailing cardboard waste and storing them on the yard as can be seen in photograph 1.



Photograph 1- Bailed cardboard stored on the yard.

During the inspection, it was noted that a third party salvage business was operating a section of the permitted waste site involved in the treatment of waste pallets to facilitate their reuse. On the 4 September 2026, NRW requested the operator to provide confirmation of the agreement between Cymru Lan Cyf and this third-party salvage business. The operator subsequently contacted NRW via telephone on 7 September 2026 and confirmed the details of the arrangement.

Following a review of the environmental permit, it was confirmed that the operator is permitted to accept waste classified as 15 01 03 (wooden packaging). Please note that the pallets accepted onto the yard may be considered as waste and are therefore subject to waste management legislation. The receipt and removal of these wastes must be recorded using appropriate Waste Transfer Notes and retained in accordance with the Duty of Care Code of Practice.

Action: ***If the operator or any tenant intends to undertake any additional waste activities that are not currently authorised by the Environmental Permit, the operator must apply for and obtain a variation to the permit from NRW before commencing those activities.***

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W2E- Permitted wastes

As permit condition 1.2.1 states, ***'No wastes other than those, which are categorised below in Table 1.2A and specified in detail in Appendix A to these conditions shall be accepted at the site.***

During the inspection, it was observed that part of the permitted area is also being rented to a third-party waste operator, who were storing wastes including refrigerators and cardboard within the permit boundary which can be seen in photo 2. Waste types such as fridges are not authorised for acceptance under Environmental Permit QP3294FQ.



Photograph 2- Bin full of cardboard waste and a fridge.

Whilst the operator has entered into an agreement to rent part of the site to this third-party waste operator, responsibility for compliance with all permit conditions remains with the permit holder, which is Cymru Lan Cyfyngerdig. The operator must ensure that all activities undertaken within the permitted boundary are carried out in accordance with the requirements of the environmental permit.

Action: ***The operator must ensure that any activities undertaken within the permitted boundary, including those carried out by third party business renting part of the permit boundary, comply with all requirements of the environmental permit.***

NRW considers the storage of unauthorised waste types within the permitted area to be a breach of permit condition 1.2.1, Permitted Waste. As this waste is not authorised for acceptance under the environmental permit, a CCS Category 3 score has been allocated and the breach has been recorded as a non-compliance against this permit condition.

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W1A - Staffing and understanding of requirements of licence conditions

As permit condition 1.4.1 states, ***'Whenever the site is open to receive or dispatch wastes, or is carrying out any of the specified waste management operations, it shall be supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the licence regarding:***

a waste acceptance and control procedures;
b operational controls;
c maintenance;
d record-keeping;
e emergency action plans;
f notifications to the Agency'.

Prior to the inspection, NRW contacted the operator on several occasions after it came to our attention that the site's Technically Competent Manager (TCM) had not completed the required Continuing Competence assessment since 21 December 2017. Despite repeated requests from NRW, this matter remained outstanding and had not been resolved at the time of the inspection.

During the inspection, the operator was unable to demonstrate that the site's nominated TCM held a valid Continuing Competence qualification. NRW therefore considers that the requirements of permit condition 1.4.1 were not being met.

On 7 September 2026, the operator subsequently submitted a copy of a temporary TCM certificate. The temporary TCM will oversee the site until the nominated TCM successfully completes the required Continuing Competence assessment.

Please note that, in accordance with the "How to Comply with Your Environmental Permit" guidance, a minimum of one hour's attendance per week is required from the technically competent manager (TCM) at all operational sites, including in-house facilities managing their own waste. A week is defined as the period from Sunday midnight to the following Sunday midnight. Records of site attendance must be maintained within the site diary and made available for inspection by NRW upon request.

Actions:

- **The operator must ensure that the temporary Technically Competent Manager (TCM) remains in place and provides the required level of technical competence until the nominated TCM has successfully completed their Continuing Competence assessment.**
- **A copy of the Continuing Competence certificate must be submitted to NRW upon completion.**
- **Whilst the temporary TCM is in place, the operator must ensure that they attend the site for a minimum of one hour per week, and that each visit is recorded in the site diary.**

During the site attendance on 6 September 2026, NRW identified that the nominated TCM's Continuing Competence requirements had not been maintained and that a suitably qualified TCM was not in place in accordance with the permit requirements. Whilst the operator has since taken steps to address this matter, the site's Continuing Competence requirements were not met between 22 December 2019 and 6 September 2026.

NRW therefore considers this to be a breach of Permit Condition 1.4.1, Staffing and Competence. A CCS Category 3 score has been allocated which reflects the absent technical competent manager on site between 22 December 2019 and 6 September 2026, however, as this site accepts primarily lower-risk waste streams, including agricultural plastics, cardboard, food waste, mixed municipal Waste and wooden pallets, which reduces the likelihood of significant environmental harm arising from the breach.

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W2E - Waste acceptance and control procedures

As stated in permit condition 4.4.1, ***'All wastes shall be received, inspected, accepted or rejected, and recorded in accordance with the standards specified in Table 4.4 below.***

During the inspection, NRW officers observed a number of third-party waste operator fleet vehicles and bins being stored within the permitted area. The operator confirmed that part of the permitted boundary is rented to the third-party waste operator.

As NRW officers were leaving the site, one of the third-party waste operator vehicles carrying bins containing waste was observed entering the yard. The operator subsequently informed NRW that the waste was still in transit and had not been accepted onto the site.

Whilst NRW has not identified a breach of permit condition 4.4.1 based on these observations, the operator is reminded that all wastes accepted at the site must be received, inspected, accepted or rejected, and recorded in accordance with the requirements of permit condition 4.4.1. The operator remains responsible for ensuring that appropriate waste acceptance procedures are implemented and followed for all waste entering the permitted boundary, including activities undertaken by third parties operating from the site.

NRW reminds the operator that all waste accepted within the permitted site boundary should be subject to the site's waste acceptance procedures and recorded in accordance with permit condition 4.4.1. The operator should ensure that appropriate controls are in place to clearly distinguish between waste that is merely in transit and waste that has been accepted onto the site.

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W2C - Waste quantity measurement systems

As stated in permit condition 4.5.1, ***'All waste accepted at and despatched from the site shall be measured in accordance with either of the following requirements:***

a) The weight of all wastes accepted at and despatched from the site shall be determined by means of a public weighbridge, or a weighbridge or scales located within the site. The weighbridge or scales used shall record quantities of wastes in tonnes to an accuracy of 0.01 tonnes; or

b) The following conversion factors shall be used:
Waste quantities shall be recorded in cubic metres and measured on the basis of the capacity of the vehicles or containers used for transport. This shall be converted into tonnes on the basis of conversion factors, which have been agreed in writing with the Agency'.

As detailed above, NRW officers observed a third-party waste operator vehicle carrying waste entering the site and passing the weighbridge without any weighing activity being observed. The operator later advised that the waste remained in transit and had not been accepted onto the site.

NRW reminds the operator that all waste accepted at or despatched from the site must be measured and recorded in accordance with Permit Condition 4.5.1. This requirement applies to all waste accepted at or removed from the permitted site, including waste accepted and managed by all third-party business operating from the site. Accurate records must be maintained and made available to NRW upon request.

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W3C – Monitoring and control of odorous emissions

As stated in permit condition 5.2.1, *'Measures shall be implemented and maintained throughout the operational life of the site to control and monitor emissions of odours from the site, in accordance with the standards specified in Table 5.2 and as per section 5.1.2 of the working plan.*

Table 5.2 Standards for monitoring and control of emissions of odours	
a) Monitoring of odorous emissions	Olfactory monitoring of aerial emissions from the site shall be carried out: • by the site manager or supervisor, at least twice a day, at the site boundary situated downwind of the waste operations, and shall be recorded in the site diary; and • by site staff supervising individual waste handling operations, during the carrying out of those operations.
b) Odorous emissions action plan	i) On detection or notification of aerial emissions of odour that are or are likely to be transported beyond the site boundary at such levels that they are likely to cause pollution of the environment or harm to human health or serious detriment to the amenity of the locality, immediate action shall be taken to stop the waste handling operations giving rise to the emission and to suppress the aerial emission from the waste. ii) The incident and the remedial action shall be recorded in the site diary.

Upon officers' arrival, an odour was detected outside the site boundary prior to entering the yard. The source of the odour appeared to be the food waste storage and handling area located adjacent to the site entrance.

During the inspection, officers observed an articulated lorry being loaded with food waste. It is acknowledged that waste handling and loading activities can temporarily increase odour emissions through disturbance of the waste. However, as odour was detectable beyond the site boundary, NRW considers that additional odour monitoring is required to demonstrate that odour management measures are being effectively implemented and maintained in accordance with Permit Condition 5.2.1.

It was also noted during the inspection that food waste originating from other businesses was being received and handled within the permitted site boundary. Regardless of the ownership of the waste or the involvement of third-party businesses, the permit holder/ operator remains responsible for ensuring that all activities undertaken within the permitted area are carried out in compliance with the permit conditions. This includes the management and control of odour emissions arising from the receipt, storage, handling and removal of waste at the site.

Actions:

- ***The Site Manager and/or a nominated supervisor shall undertake and record odour monitoring at the site boundary a minimum of twice daily while the site is operational.***

- ***Monitoring results, together with any corrective actions taken in response to odour issues, shall be recorded in the site diary and made available for inspection by NRW upon request.***
- ***Provide NRW with a copy of the current Odour Management Plan and any associated Odour Action Plan for review.***
- ***Review waste handling and loading activities associated with food waste to ensure that adequate measures are in place to minimise odour emissions beyond the site boundary.***

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W3G - Fire

As stated in permit condition 5.6.1, ***'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, a large quantity of waste wooden pallets was observed being stored within the yard, as shown in Photograph 3. The pallets were stacked in a single pile, estimated to be approximately 24 pallets high. NRW officers estimated that the stack remained within the maximum storage height of 4 metres specified in the site's current Fire Prevention and Mitigation Plan (FPMP).



Photograph 3 - Stockpile of wooden pallets.

NRW reminds the operator that all combustible wastes must be stored and managed in accordance with the requirements of the site's FPMP to minimise the risk of fire and ensure compliance with permit condition 5.6.1.

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W4A - Records of waste movements

As stated in permit condition 6.2.1, ***'A record shall be kept of each load of wastes***

received and of all waste removed from the site. This record shall include the following for each vehicle load of waste for

waste received:

a) origin of waste
b) date received
c) quantities in tonnes received and waste type
d) nature of the waste (solid, liquid or sludge)

for waste removed
e) date removed
f) quantities in tonnes removed and waste type
g) destination of waste removed
h) nature of the waste (solid, liquid or sludge)'.

During the inspection, copies of waste transfer notes relating to recently received plastic waste, food waste removed from site, and agricultural plastic waste removed from site were requested. These documents could not be provided during the inspection as the operator had temporarily taken the records folder off site.

On 7 September 2026, NRW subsequently received the following via email:

- Two Waste Transfer Notes for food waste received at the site;
- Two Waste Transfer Notes for food waste removed from the site; and
- Two Waste Transfer Notes for agricultural plastic waste removed from the site.

These documents have now been reviewed. The waste transfer note relating to farm plastic wrap removed from the site on 15 June 2026 described the waste as "Farm plastic loose", which is considered sufficient to identify the waste type for the purposes of Permit Condition 6.2.1. However, the waste transfer note did not record the appropriate European Waste Catalogue (EWC) / List of Waste (LoW) code for the waste.

Whilst the permit does not specifically require EWC codes to be recorded, the Waste Duty of Care Code of Practice states that when waste is transferred to an authorised person, the waste description must be accurate and contain all information reasonably required to ensure its lawful and safe handling, transport, treatment, recovery or disposal. This includes classification of the waste using the appropriate List of Waste (LoW) / European Waste Catalogue (EWC) code.

Although the waste type was recorded, the waste transfer note did not fully comply with the requirements of the Waste Duty of Care Code of Practice in relation to waste classification.

Action: ***Ensure that all future waste transfer notes include the correct List of Waste (LoW) / European Waste Catalogue (EWC) code for the waste being transferred, in accordance with the Waste Duty of Care Code of Practice.***

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Also stated in permit condition 6.2.2, ***'A summary record of the waste types and quantities accepted and removed from the site shall be made for each quarter of the financial year and shall be submitted to the Agency within 1 month following the end of that quarter. The summary record shall be in the format detailed in Appendix B or otherwise subsequently agreed with the Agency in writing'.***

NRW officers reviewed the site's records prior to the inspection. It was noted that both quarterly waste returns submitted to date (January to April and May to July 2026) were received within the required timescale, namely within one month of the end of each reporting quarter.

Please note that this review was limited to confirming the submission dates of the quarterly returns. The content of the returns, including the accuracy of waste types reported and the quantities of waste accepted and removed from the site, has not yet been assessed. As such, no compliance determination has been made regarding the accuracy or completeness of the information contained within the returns.

Action: ***The operator must continue to submit quarterly waste returns to NRW within the timescales specified by the permit. The operator must also ensure that all information contained within the returns, including waste types and quantities of waste accepted and removed from the site, is recorded accurately and is supported by site records***

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NRW would like to thank Cymru Lan Cyfyngedig 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.