Compliance Assessment Report CAR_NRW0052641

Permit being assessed: KP3636HB.

For: The Recycling Centre EPR/KP3636HB, **held by:** Egan Waste Services Limited

At: Egan Waste Services Recycling Centre Unit A15 Treforest Industrial Estate , Pontypridd, CF37 5TA.

Type of assessment: Site Inspection,

Reason: Routine.

On: 14/07/2026 between 10:00 and 13:00.

Parts of permit assessed: 1.1.1, 2.1.1, 3.1.2, 4.3.2, 2.3.2.

NRW Lead Officer: Dale Padfield, accompanied by Greg Gardner.

Report sent to: ~, Dangerous Goods Safety Advisor , on 12/10/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	1.1
IR4B - Installations - Information - Reporting	Action only (X)	
IR1A - Installations - Management - General Management	C3 Minor	1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	C3 Minor	4.3.2
IR1A - Installations - Management - General Management	Action only (X)	

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
IR1A	Action 1 ~ Egan Waste Services Limited 11th August 2026: ~ Provide a copy of the updated procedures to NRW.	30/09/2026
IR4B	Action 2 ~ Egan Waste Services Limited 11th August 2026: ~ Use the guidance provided within this CAR form to calculate the specific usage for the 2025 annual reporting returns and re-submit the returns.	30/09/2026
IR1A	Action 3 ~ Egan Waste Services Limited 11th August 2026: ~ Egan Waste to produce documented procedures covering the reporting and notification aspects of the permit. Provide a copy of the updated procedures to NRW.	30/09/2026
IR3A(1)	CAR_NRW0052641 Action 4 ~ Egan Waste Services Limited 11th August 2026: ~ Provide an explanation for the elevated HOI sample result.	30/09/2026
IR4C	CAR_NRW0052641 Action 5 ~ Egan Waste Services Limited 11th August 2026: ~ Provide a retrospective Schedule 5 notification for the HOI exceedance recorded on the 06th of February.	30/09/2026
IR1A	CAR_NRW0052641 Action 6 ~ Egan Waste Services Limited 11th August 2026: ~ Provide the information and confirmation of completion of the actions issued in the email copied above (sent on the 23rd of July).	13/08/2026

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

Egan Waste Services Limited

EPR/KP3636HB

This Compliance Assessment Report (CAR) details a site inspection undertaken on the 14th of July 2026. The inspection comprised an office based review and discussion of action issued in the previous CAR form (CAR_NRW0050884) and a site inspection of the storage arrangements for waste as well as other aspects of site operations. This CAR form details the office based review of actions form the aforementioned CAR from, and provides a copy of the email requesting immediate actions to address

significant risks identified during the site inspection. The full details of the site inspection will be captured in a separate CAR form, once all the requested information becomes available.

Review of Actions from CAR_NRW0050884

Action 1:

Waste transfer notes for waste with EWC code 02 06 03 were received. Egan stated that the wrong EWC code had been chosen for the waste removed, as discussed during the site visit, waste should keep the original EWC code assigned unless the waste is treated resulting in the fundamental change of its physical or chemical properties.

Action 2:

EWC 08 01 12 ~ Waste stated as being received as EWC 20 01 28, with the possibility of some of the wastes entering site via skips. As above, the wastes should therefore be removed form site under the same EWC code.

EWC 08 04 10 ~ Waste stated as being 1 x IBC of adhesive booked in under 08 01 20. The waste transfer note (WTN) for the waste received states 1 x IBC of adhesive liquid with an original EWC code 08 04 09 crossed through and EWC 20 01 20 overwritten. If the correct waste code was EWC 08 04 10 it would appear an incorrect code was used twice before a final correct code was applied. Waste should be correctly assigned before the waste is collected.

EWC 16 05 09 ~ Egan stated ~ "Customer originally requested drums of compressor oil, when the driver arrived it was actually drums of cured latex that he required collection of. Driver called the office from site and was advised that he could collect the waste and to ask the customer to amend the paperwork to reflect the new waste stream with him. Unfortunately the paperwork was not changed from the original and therefore booked in incorrectly."

There are a few issues with this, the driver was told he could accept the waste but the waste was code identified for this waste (16 05 09) is not a permitted code listed in the permit. The WTN has not been changed and has been signed to state the waste collected conforms to the details within the note, this is a breach of several aspects of the waste duty of care.

EWC 11 01 11 ~ Egan have stated "Refers to Daelic Cadmium which is Liquid waste used for metal plating. This collected from Mitie / Cardiff Airport, this has been collected under 17 04 09 Metal waste containing hazardous substances. Drums collected and bulked onto a pallet ready for disposal."

EWC code 11 01 11 appears to be the correct code, suggesting the waste was incorrectly coded when received.

Where miscoding has been identified, procedures should be updated to ensure no reoccurrence. Driver and those signing WTN's should ensure they are familiar with the requirements of the waste duty of

care and their responsibility when collecting wastes.

Action 3:

A review of waste acceptance procedures was undertaken. The primary cause of wastes being removed from site under different EWC codes was stated to be a result of the onward waste treatment or disposal sites dictating the EWC codes for the waste leaving the Egan Waste facility.

This is considered bad practice and potentially non-compliant. The waste producer/holder and the site accepting the waste has a duty to ensure the waste is correctly classified and described based on the actual characteristics, composition and origin, not simply to match the requirements of the next facility.

- EWC codes should reflect the waste itself, not the preference of the receiving facility. Classification must be based on the waste's source, composition and hazardous properties (where applicable). Changing a code solely because an onward facility prefers a different code can result in misclassification.

- Loss of traceability. If a waste leaves Egan Waste under a different EWC code to that under which it was accepted, without a justified technical assessment, the audit trail becomes unclear. This makes it difficult to track the waste through the management chain and demonstrate compliance.

- Risk of inaccurate records and reporting**.** Waste transfer notes, hazardous waste consignment notes, site returns and permit-related records may become inconsistent, undermining confidence in waste management data.

- Potential breach of Duty of Care requirements. All parties handling waste must take reasonable measures to ensure the waste is accurately described. Allowing a third-party facility to dictate the code without a documented classification assessment may indicate that this duty has not been fulfilled.

- Risk of inappropriate treatment**.** Incorrect coding can lead to waste being directed to treatment, recovery or disposal operations that were not intended for that type of waste, potentially creating environmental and compliance risks.

The practice of assigning EWC codes based primarily on the requirements of onward waste treatment or disposal facilities, rather than on a documented assessment of the waste's origin, composition and characteristics, is considered poor practice. This approach creates a risk of waste misclassification, weakens traceability throughout the waste management chain, and may result in inaccurate waste records, potentially compromising compliance with waste Duty of Care obligations and permit

requirements.

It is unclear how much waste has been removed form site taking this approach, as the only wastes subject to further scrutiny were a handful of EWC codes that are not permitted on the site.

This is seen as a management system failure, whereby the waste acceptance and classification procedures were not sufficiently robust to ensure EWC codes assigned to outgoing wastes were based on a documented assessment of waste origin, composition and characteristics. Waste codes were instead dictated by the onward receiving facilities and amended to align with their requirements, creating a foreseeable risk of waste misclassification and reducing traceability through the waste management chain. The management system therefore failed to ensure consistent and accurate waste classification.

This demonstrates deficiencies in the site's waste classification and transfer procedures and creates a foreseeable risk of waste misclassification and loss of traceability within the waste management chain. Although no direct environmental impact was identified, the management system was not being implemented in a manner sufficient to ensure consistent and accurate waste classification.

For the wastes streams identified above, there is no evidence that the hazardous nature of the wastes has been concealed, the EWC codes applied to the identified wastes appears appropriate, the waste is known to have been sent to permitted waste facilities and no incident is known to have occurred. However, the traceability and classification integrity were compromised. Egan waste have updated their procedures, including how waste transfers out of the facility occur, including ensuring the EWC codes for the waste is assigned by them and not the receiving site.

In this instance, a category 3 non-compliance is issued against the management system.

Non-Compliance: A Category 3 non-compliance is recorded against the management system for failing to ensure consistent and accurate waste classification, creating a foreseeable risk of waste misclassification with the potential to cause environmental harm. **Permit condition 1.1.1.**

CAR_NRW0052641 Action 1 ~ Egan Waste Services Limited 11th August 2026: ~ Provide a copy of the updated procedures to NRW. Due 30th September 2026.

Action 4

The incorrect CAR reference was given in the previous CAR form, the correct refence is CAR_NRW0046402. As discussed, the reports require energy and water usage to be expressed as a 'specific usage' which should be expressed, for example, water would be expressed as m^3 /unit output. A typical metric for a waste transfer station would be to use the total quantity of waste received in a year as the 'unit output' but equally, the site could use another metric in a situation where it would be deemed more suitable. This could be the annual figure for tonnes of oil treated, if oil treatment was the dominant use of water or energy at the facility.

For example, the specific water usage could be expressed as follows:

Total water use for 2025 ~ 784m^3

Total tonnage of waste received for 2025 ~ 3,280 tonnes

Specific usage = 784m^3/3280 tonnes = **0.239 m^3/ per tonne of waste received.**

Expressing the specific usage in this way provides a means to compare usage year on year and allows water use / energy efficiency to be evaluated, whereby any trending increase or decrease can be identified.

It is appreciated that the energy and water usage at the facility is relatively minimal, however the process does still use water and energy (washing, cleaning, lighting, trommel equipment, pumps etc) and the permit requires raw material and energy usage to be used efficiently, this cannot be assessed or tracked efficiently if the facility is not recording

Action 4 is not considered complete.

CAR_NRW0052641 Action 2 ~ Egan Waste Services Limited 11th August 2026: ~ Use the guidance provided within this CAR form to calculate the specific usage for the 2025 annual reporting returns and re-submit the returns. Due 30th September 2026.

Action 5

The operator stated that there are currently no procedures in place to capture the reporting requirements of the permit.

As such, without documented reporting procedures:

- Staff may not know what reports are required, when they are due, or who is responsible for submitting them.
- There is an increased risk of late, incomplete or inaccurate reporting to NRW.
- Permit breaches, abnormal events, monitoring exceedances, and other notifiable matters may not be identified and reported within the required timescales.
- Compliance can become dependent on the knowledge of individual employees rather than a robust management system. If key staff leave, compliance knowledge may be lost.
- The operator cannot readily demonstrate that it has adequate systems in place to ensure compliance with permit conditions.

The operator's management system does not include a documented procedure identifying permit reporting requirements, responsibilities and submission deadlines. Although all required reports had been submitted at the time of inspection and no environmental impact has been identified, the absence

of a formal procedure represents a management system deficiency that could increase the risk of future reporting non-compliances. A minor Category 3 non-compliance will be issued on this occasion as there is no evidence of missing reports, however, as discussed further within this report, there is evidence of notification failures.

Non-Compliance: A Category 3 non-compliance is recorded against **Permit Condition 1.1.1.** The site's Environmental Management System does not contain adequate documented procedures to demonstrate how the operator will comply with the permit's reporting and notification requirements, including the identification of reporting obligations, submission timescales, and assigned responsibilities.

CAR_NRW0052641 Action 3 ~ Egan Waste Services Limited 11th August 2026: ~ Egan Waste to produce documented procedures covering the reporting and notification aspects of the permit. Provide a copy of the updated procedures to NRW. Due 30th September 2026.

Action 6

The operator has stated that the sampling procedure has been further updated to reflect the requirements of the monitoring guidance. This action will be closed, however, further assessment will be undertaken during an Operator Monitoring Assessment (OMA) audit which will be scheduled for a later date.

The operator was also asked to provide a plan or details to demonstrate the homogeneity of the effluent being discharged at the S1 discharge point to sewer. The operator currently utilises a single grab sample to demonstrate compliance with the emission limit values (ELV's) in the permit. However, if the effluent is not homogenous, a single grab sample will not be representative of the discharge being monitored.

For each batch discharges it would be expected that the operator has considered / undertakes or can demonstrate the following, which would provide some confidence that the samples of effluent being discharged through S1 are representative entire discharges:

- documented tank mixing procedures;
- confirmation that effluent / wastes within the tank do not stratify;
- evidence that oil, solids and aqueous phases do not separate before sampling;
- comparative sampling from different depths or locations within the tanks;
- historical analytical data demonstrating low variability; and
- a written sampling methodology explaining why a single sample is representative of the batch.

It is understood that the operator cannot currently demonstrate the homogeneity of the effluent, and does not undertake any measures to ensure the effluent is homogenous. As such to provide representative monitoring results the operator should consider the following:

1. Composite sampling

Where the discharge occurs over a period of time, a:

- time-proportional composite sample, or
- flow-proportional composite sample (where flow measurement is available)

would normally provide a more representative assessment of the quality of the discharged effluent than a single grab sample. This reduces the influence of short-term variability and stratification.

2. Multiple grab samples

If composite sampling is not practicable, consideration could be given to undertaking:

- take samples from different stages of the discharge;
- take samples at different depths and locations within the holding tank; or
- collect several grab samples and combine them into a composite.

This would help demonstrate that the analytical result represents the whole effluent volume rather than a single fraction of it.

3. Mixing and verification

If the operator wishes to rely on a single grab sample, they need to be able to demonstrate:

- the tank is adequately mixed before sampling;
- there is no significant stratification;
- solids are not settling;
- oils are not floating separately;
- verification sampling confirms uniform concentrations.

However, this last approach will require robust evidence to demonstrate that any mixing procedures etc are adequately homogenising the effluent and single grab samples are indeed representative of the batch discharges.

If you cannot provide evidence of homogeneity or mixing of the effluent, and therefore the representativeness of the current sampling regime, the validity of the monitoring data obtained to date becomes questionable and the monitoring programme is unlikely to comply with the permit and the principles within the guidance for representative sampling.

It is understood that the current sampling procedure and sampling undertaken to date has been done by a grab sample, the operator **must** update this to reflect sampling an effluent which may be heterogeneous in nature or provide NRW with evidence demonstrating how a grab sample is providing representative data.

It also became evident that the operator is not currently recording any details of the effluent discharges.

Basic information such as volumes, time and date of discharge, details of waste or batch being treated, should recorded as part of the sampling. This information can be useful when required to investigate any ELV exceedance or process upset.

Action 7

The operator stated that no discharges have taken place as a result of a pump failure which was still undergoing maintenance. However, the operator also stated that a sample had recently been sent to the laboratory in June. It is unclear how a sample has been taken if the pump has not been non-operational since March. This also highlights a potential issue with waste accumulation, in quarter one (January to March) of 2026, Egan waste services reported to receive a total of 245.81 tonnes of oily water (EWC code 13 05 07) and a further 102 tonnes during quarter two (April – June).

Additionally, wastes coded as EWC 161002 are stated to be treated and discharged through the sites tanks to the drain. For this EWC code, 60 tonnes was reported to have been accepted onto site during quarter one and a further 119 tonnes during quarter two.

Action 3 ~ Egan Waste Services Limited 11th August 2026: ~ Provide a copy of the monitoring results from June once available.

Action 8

A copy of a report was provided detailing an inspection undertaken by a third party contractor. The report highlighted that, where new surfacing had been laid, it was done so to an accepted industry standard and tied in well with existing concrete slabs to provide a good impermeable layer. This was confirmed during the site walk over, whereby, the areas that had been re-surfaced were in good condition.

However, the report highlighted that the inspection was limited to the outdoor areas and only areas that were visible, not obstructed by waste, storage facilities, vehicles or skips etc.

This action remains effectively open until it can be demonstrated that all operational areas have a suitable impermeable surface.

Action 9 & Action 10

Egan Waste have not complied with this action. Waste continues to be stored and treated out on the yard. The operator stated they were unaware that storing, sorting and treating the waste on yard was a breach of the permit, as this has not been brought to their attention previously and has been an ongoing practice for several years. The operator stated that there was no possibility of conducting this operation within any of the buildings on site due to logistical and space constraints.

As stated during the visit, this is now regarded as an on-going non-compliance. Egan Waste services will need to provide NRW with a plan on how they intend to return to compliance. If the intention is to continue to use the yard to undertake this operation a permit variation will be required to ensure the

operator has appropriate controls in place to prevent and minimise the risk of pollution.

This has highlighted further management deficiencies which are likely the root-cause of the non-compliance, this is being investigated further in light of the findings of the site inspection which will be captured in full detail in a separate CAR form.

Action 11

The operator provided a draft document showing the list of assets which had been compiled, however there were no current procedures available for planned maintenance of the sites assets and infrastructure. The relevance of this is discussed in more detail in the site visit report.

Monitoring results provided by DCWW identified that a sample taken on the 06th of February exceeded the permitted ELV for HOI, with a result of 17.1 mg/l against an ELV of 10.0 mg/l. A notification should have been provided to NRW via a Schedule 5 notification as per permit condition 4.3.2, failure to provide notification is a breach of the permit, the same issue has previously been identified (CAR_NRW0046402). By failing to provide notification impedes NRW's ability to investigate and ensure control measures are implemented to prevent a re-occurrence or determine any environmental impact. In this instance, the HOI is above the ELV, however the emissions are to sewer and within the TEC, the emissions do however exceed BAT indicating an issue with the process or abatement. This exceedance is deemed to a have a minor environmental impact, along with the notification failure.

Non-compliance: **Non-Compliance: A Category 3 non-compliance** is recorded against **Permit Condition 3.1.2.** The site has exceeded the permitted ELV for HOI to the S1 discharge point.

CAR_NRW0052641 Action 4 ~ Egan Waste Services Limited 11th August 2026: ~ Provide an explanation for the elevated HOI sample result. **Due 30th September 2026.**

Non-Compliance: A Category 3 non-compliance is recorded against **Permit Condition 4.3.2.** The site has failed to provide a Schedule 5 notification for the HOI ELV exceedance.

CAR_NRW0052641 Action 5 ~ Egan Waste Services Limited 11th August 2026: ~ Provide a retrospective Schedule 5 notification for the HOI exceedance recorded on the 06th of February. **Due 30th September 2026.**

Further actions are required as several deficiencies were identified during the site inspection, the site is currently deemed not compliant with the permit. Following the site inspection and an evaluation of the information gathered, the following email was sent to Egan Waste Limited on the 23rd of July:

"Immediate Actions Required Following Site Inspection – 14 July 2026

During the site inspection undertaken on 14 July 2026, Natural Resources Wales identified a number of potential permit non-compliances and significant deficiencies in the storage and management of hazardous waste. A full compliance assessment, including consideration of compliance classification scores and any subsequent enforcement response, has not yet been completed. The findings of that assessment will be formally recorded within a Compliance Assessment Report (CAR), which will detail all identified non-compliances and any regulatory actions required.

Notwithstanding the above, several of the issues observed during the inspection present an immediate risk of pollution, fire, chemical reaction and harm to human health and the environment. As such, the following actions are required without delay.

1. *Relocate Hazardous Waste Stored Externally*

Due 31st July 2026

Hazardous wastes were observed being stored externally in areas not authorised for such storage (contrary to Permit Condition 2.3.1(a)).

In addition, the hazardous waste vessels have not been provided with suitable secondary containment (contrary to Permit Condition 3.2.3). The hazardous waste being stored the East of Tank farm were located adjacent to unmade ground, creating a significant risk of:

- *Leaks and spillages entering the ground.*
- *Pollution of groundwater and surface water.*
- *Contamination of land.*
- *Escalation of fire incidents.*
- *Uncontrolled releases resulting from container failure.*

All hazardous wastes currently stored externally must be relocated without delay to appropriate storage areas that comply with the permit requirements and provide adequate environmental protection, including suitable secondary containment. Pending completion of the corrective actions, no further hazardous waste should be deposited, stored or accumulated within unauthorised external storage areas.

An immediate inspection of all hazardous waste containers should also be undertaken to identify any evidence of damage, deterioration, corrosion, leakage, or loss of containment. Any compromised

containers must be overpacked, transferred, or otherwise managed without delay to prevent pollution and mitigate risk. Any leaks or occurrences were pollution is identified to be occurring or to have occurred must be reported as required by Permit Condition 4.3.1.

Evidence of the actions taken, including photographs and an updated site layout plan identifying storage locations, should be provided.

2. *Segregate and Store Hazardous Wastes Appropriately*

Due 31st July 2026

Multiple hazardous wastes with potentially incompatible chemical properties were observed being stored in close proximity.

The current storage arrangements create a significant risk of:

- *Fire initiation.*
- *Fire escalation.*
- *Violent chemical reactions.*
- *Generation of hazardous gases.*
- *Pollution to land and water.*
- *Risks to site personnel and emergency responders.*

A review of all hazardous waste storage arrangements must therefore be undertaken and all incompatible wastes segregated and stored in accordance with their hazard properties and recognised compatibility requirements with appropriate separation and segregation implemented. This failure is a breach of Permit Condition 1.1.1.

Evidence of the actions taken, including photographs and an updated site layout plan identifying storage locations, should be provided.

3. *Provide a Current Waste Inventory of Hazardous Wastes*

Due: 31st July 2026

Provide a complete and accurate inventory of all wastes currently stored on site.

The inventory should include, as a minimum:

- *Waste description.*
- *EWC code.*
- *Quantity stored.*
- *Hazard classification and relevant hazard properties.*
- *Container type.*
- *Storage location.*
- *Date received on site.*
- *Current storage status (e.g. quarantined, awaiting treatment/sorting, awaiting dispatch).*

4. *Provide Current Waste Storage Risk Assessments*

Due: 31st July 2026

Provide copies of all current risk assessments relevant to the storage and handling of waste on site, including but not limited to:

- *Hazardous waste storage.*
- *Chemical compatibility assessments.*
- *Spill and pollution prevention measures.*
- *Fire prevention and mitigation arrangements.*
- *Emergency response procedures.*
- *Secondary containment arrangements.*

The above documentation should be present as part of the site environment management system,

failure to have or to comply or produce such risk assessments would be a non-compliance with Permit Condition 1.1.1.

All information sent at the request of this email should be returned to myself and the following email address:

industryregulation.southcentral@cyfoethnaturiolcymru.gov.uk

Failure to provide the requested information and implement the required corrective actions within the specified timescales will be considered a failure to address significant permit non-compliances and will result in an escalation of NRW's enforcement response."

Egan Waste responded to the email on the 31st of July requesting an additional week to complete the actions. A request for an update was sent to Egan waste on the 11th of August.

Further non-compliance scoring will be issued in relation to the non-compliances identified, these will be evaluated and scored once the all the relevant information has been obtained.

CAR_NRW0052641 Action 6 ~ Egan Waste Services Limited 11th August 2026: ~ Provide the information and confirmation of completion of the actions issued in the email copied above (sent on the 23rd of July). Due 13th August 2026.

End.

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.