

Compliance Assessment Report

Report ID:
CAR_NRW0035241

This form will report compliance with your permit as determined by an NRW officer

Site	Natural U K Ltd Healthcare Management Facility	Permit Ref	DB3231RX		
Operator/Permit holder	Natural U K Ltd				
Regime	Waste Operations				
Date of assessment	06/06/2019	Time in	11:00	Out	14:30
Assessment type	Audit				
Parts of the permit assessed	Paperwork and site				
Lead officer's name	Warrick, Linda				
Accompanied by	Edwards, Michael				
Recipient's name/position	Jon Hawke/ Technical Manager	Date issued	02/07/2019		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
C1 - General Management - Staff competency/training	C3	1.1.4

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	4
------------------------------------	----------	---	----------

If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

In attendance

Rob Poyer, Jon Hawke - Natutal UK

Linda Warrick, Mike Edwards - NRW

This is an handover visit for Mike Edwards. Mike was given a comprehensive run through of the sites operations.

Technical competence

Jon Hawke has not met the continuing competency renewal date. There has been some confusion over the codes required. This should be discussed with WAMITAB and the information forwarded to myself. Please confirm as soon as possible.

We discussed the change in waste returns submissions and the new reporting requirement to include your Technical Competence status and expiry date on the returns form.

Training

Staff are completing WAMITAB level 2 and 3 qualifications - This is seen as Best Practice and will ensure all personnel meet a good understanding of the facility and their role in maintaining the high standards met by the site.

EMS

The site is not accredited anymore to a recognised externally accredited management system. The site have forwarded the spreadsheet which identifies that the site management system does flag items such as continuing competency renewal. The CAR has been amended to reflect this. The issue has been with the confusion over codes as identified above. Please ensure this is communicated with NRW in advance of any possible non compliance issues.

Pre acceptance

The pre acceptance check list is very comprehensive and trends are looked at to identify if producers are requiring further advice and guidance. There have been some issues with acceptance from hospitals which have resulted in some waste streams being refused.

Site walk through

The housekeeping was of a high standard, all containers were well organised and labelled. Spill kits are in place and placed in an appropriate accessible area. Waste is segregated into the appropriate EWC codes.

Processed waste

Currently the majority of the processed waste goes to Derwen for onward blending and transfer to waste to energy plants in Europe.

Brisco take a small amount of the processed waste for onward blending at the plant in Neath Port Talbot (MREC).

Consignment notes were not checked during this visit.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035241**

This form will report compliance with your permit as determined by an NRW officer

Site	Natural U K Ltd Healthcare Management Facility	Permit Ref	DB3231RX
Operator/Permit holder	Natural U K Ltd	Date	06/06/2019

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
C1	C3	Ensure appropriate technical competence is in place	01/07/2019

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.