

## Compliance Assessment Report CAR\_NRW0037055

**Permit being assessed:** BB3697ZN.

For: New Horizon Plastics Co Ltd, held by New Horizon Plastics Co Ltd

At: Gelicity House Unit 27, Castle Park Industrial Estate, Flint, Flintshire, CH6 5XA.

**Type of assessment carried out:** Site Inspection, Reason: Routine.

On 08/10/2020 between 14:00 and 14:50.

Parts of permit assessed: 1.1, 2.1, 2.2, 3.5, 4.2

**NRW Lead Officer:** Amy Henderson, accompanied by Steven White.

**Report sent to:** Philip Thomas/Tony Liu, Directors on 28/10/2020.

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

| Part of permitted activity assessed (criteria)   | Assessment result | Permit condition |
|--|-------------------|------------------|
| C1 - General Management - Staff competency/training  | Assessed (A)      |                  |
| B4 - Infrastructure - Containment of stored materials  | Assessed (A)      |                  |
| D1 - Incident Management - Site security   | Assessed (A)      |                  |
| F3 - Amenity - Dust/fibres/particulates and litter   | Assessed (A)      |                  |
| G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales | Action only (X)   |                  |

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

| Total number of non-compliances recorded | Total non-compliance score |
|--|----------------------------|
| 0  | 0                          |

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 |
|----------|--|-------------|
| G4       | Submit outstanding waste returns by 30/11/2020 | 30/11/2020  |

Action 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.

**At this time, we do not intend to take any further action.**

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

This was an initial site inspection carried out by Waste Regulation Officer Amy Henderson and Senior Waste Regulation Officer Steven White. Due to Covid-19 regulations the site were made aware the previous day that a site inspection would be taking place. Due to Covid-19 the inspection was carried out in outside areas only.

On arrival at site we were met by Philip Thomas and Tony Liu, who accompanied us throughout the visit. The site was operational at the time of the inspection, with plant/machinery moving waste within the site area and inputting waste into the waste treatment process.



Photo taken of the site during the inspection

During our inspection it was stated that there was approx 200t of waste plastic onsite and the weekly throughput is approx 650t. It was stated that the site are in the process of moving their storage to Aviation park, where the waste will be stored under an S2 exemption.

The site has a 'dry wash' method of cleaning the waste. Officers were shown samples of the waste before and after this process.



Photo of the waste plastic after it has been through the 'dry-wash' process.

The site has also installed a new fence to the rear of the storage area. This was following concerns from the Fire and Rescue service regarding the fire risk from the footpath adjacent to the site. The new fence aims to minimise the risk of arson/accidental fires from members of the public using the footpath.

Prior to the visit a waste return check was carried out, it was found that no waste returns had been submitted since the permit was granted. On discussion with the operator, returns had been submitted to the Producer Responsibility Scheme. Amy Henderson carried out a follow up check and it was confirmed that although returns have been submitted to this team, separate returns also need to be submitted for the permit. Details of to submit these were sent via email. It has been listed as an action for the site to submit the outstanding waste returns by 30/11/2020.

Discussions took place around the site wishing to treat waste from the cable manufacturing process (EWC 12-01-05), a follow up check confirmed this waste type was not on the site permit. Advice & Guidance was given that the site would need to vary their permit if they did wish to treat this waste type.

Due to the difficulties of carrying out this initial site inspection whilst adhering to Covid-19 regulations, a follow up email was sent to ensure all aspects of the initial site inspection were covered.

There were no breaches to score from this site inspection.

Many thanks for your time and co-operation during our visit.

Kind regards  
Amy Henderson  
Waste Regulation Officer - NE

*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 2012.*

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 only relating to the activity assessment                   |
| 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.

**What are suspended scores?**

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 and Waste action criteria (used in section 1 and 2):****A: Permitted activities**

- A1 Specified by permit

**B: Infrastructure**

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

**C: General management**

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

**D: Incident management**

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

**E: Emissions**

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

**F: Amenity**

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

**G: Monitoring and records, maintenance and reporting**

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

**H: Resources efficiency**

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

## Enforcement response

Any permit condition non-compliance 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 20 working days to let you know if we agree to your request.

## What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at [ask@ombudsman.wales](mailto: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.