

Compliance Assessment Report

Report ID:
CAR_NRW0021663

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

Site	Trojan Electronics Limited	Permit Ref	DB3993HD		
Operator/Permit holder	Trojan Electronics Limited				
Regime	Waste Operations				
Date of assessment	23/05/2016	Time in	09:30	Out	11:00
Assessment type	Audit				
Parts of the permit assessed	Operational area				
Lead officer's name	Davies, Gareth				
Accompanied by					
Recipient's name/position	Matthew Jones/ Operations Director	Date issued	16/06/2016		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
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KEY: See Section 4 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **N** = Not Assessed, **X** = Action only

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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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

Present

Matthew Jones (MJ) – Trojan Electronics Limited (TEL)

Phillip Rees (PR) – Consultant and TCM for TEL

Gareth Davies (GD) – Natural Resources Wales

The purpose of the visit was to assess compliance with environmental permit EPR/DB3993HD held by TEL.

Permit Compliance

TEL receive waste electrical and electronic equipment (WEEE) from customers who deem them to be waste. The WEEE is received by TEL, assessed to see if it is working or requires repair. If it requires a repair then TEL will attempt to repair the WEEE.

At the start of the visit a short site tour was carried out starting at the waste reception area. The WEEE is received on pallets. Each pallet and item is logged into TEL's system and then given a specific reference that is used track the pallet through the process. Once the pallet has been logged onto the system then it will be taken through to the assessment area. Each WEEE item on the pallet is then assessed against the reported fault. Where possible WEEE items are repair, repackaged and then sent for re-sale.

When an item cannot be repaired then it is put in a separate pallet for removal off site for further processing at a permitted site.

Following the site tour a review of the paperwork and written management system was undertaken. MJ confirmed that TEL are currently ISO 14001 and ISO 9001 compliant. GD reviewed a number of sections of

the written management system. The training matrix was reviewed. Staff that are responsible for accepting loads of WEEE receive specific training based on waste in and waste out requirements. There are template consignment notes in place so that these can be checked to ensure the incoming consignment of WEEE has the relevant and complete paperwork in place. A training matrix is in place across each specific role.

Waste Returns

The waste returns were discussed and a number of points were raised and clarified. There is no requirement to include the waste codes for waste that is generated in the transport of the WEEE, such as packaging. This includes the paper and cardboard, plastic and wood. Subsequently the waste returns will only need to include any WEEE received at site and then any WEEE material removed from site.

- Hazardous Waste Regulations - Consignment Notes and Consignee Returns

A copy of a consignment note for WEEE received and WEEE removed from TEL were taken for review. Following review all of the relevant information was contained.

GD raised the point that Consignee Returns were not currently being submitted to NRW by TEL. PR understanding was that these were not done as they had not been requested by NRW. GD agreed to check that with John Davies of NRW there was no part of the AATF status that removed the requirement to submit consignee returns. Following clarification with John Davies, it was confirmed that there was nothing as part of the AATF status that removed the requirement to submit consignee returns. Subsequently TEL will need to submit consignee returns going forward and also provide consignee returns for those quarters that have been missed.

It is proposed that TEL will submit consignee returns for all future quarters and then submit an additional outstanding quarter until all consignee returns are received. Further information can be found on the requirements of consignee returns via the following link below.

<http://naturalresources.wales/waste/hazardous-waste-returns/?lang=en>

TEL should ensure that they are meeting all of the relevant requirements under directly associated legislation. It is not for Natural Resources Wales to request the relevant submissions.

END

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EPR Compliance Assessment Report

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Operator/Permit holder	Trojan Electronics Limited	Date	23/05/2016

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.

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			

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 reports should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty 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.