

Mr. P and Mr S Thomas  
TBS  
Waterston Industrial Estate  
Milford Haven  
Pembrokeshire  
SA73 1DP

**Our ref:** ZB3297TP

**Your ref:**

**Date:** 24 August 2017

Dear Sir / Madam

### **Natural Resources Wales advice for facilities accepting waste tyres**

Natural Resources Wales is aware of changes in the market conditions for the export of waste tyres. We are contacting you because a review of waste returns data indicate that you accept waste tyres on site or you accept end of life vehicles and are therefore likely to be a waste tyre producer.

The purpose of this letter is to make you aware of the export of waste tyres is likely to become more difficult and that this will create difficulties for operators handling tyres.

We would like to remind you that despite these challenges you will still need to ensure that you are able to comply with the conditions of your Environmental Permit and manage stockpiles in a way to reduce fire risk.

We will be monitoring the situation during compliance visits to your site.

This situation may lead to an increase of illegal activity and so we would like to remind you that it is your legal duty to ensure that these tyres are disposed of in a way which does not pose a threat to the environment.

It is your responsibility to ensure that your waste tyres are being collected by a properly licensed waste carrier, taken to a permitted facility and disposed of properly.

It is therefore your duty to make proper enquiries of persons offering to dispose of your waste tyres.

You should ensure that any company, business or individual collecting your waste tyres -

- i) has a valid waste carriers licence, this can be checked via the Natural Resources Wales website [www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk); and
- ii) that all locations where the tyres are kept or disposed of are suitably permitted facilities.

The producer and waste carrier **MUST** keep documents for the transfer of waste.

The document must include;

- What the waste is and quantity
- Appropriate EWC or List of Waste code
- How it is contained
- The time and place of transfer
- The name and address of both parties and their signatures
- Carriers registration details
- The capacity in which the transferor and transferee are acting (e.g. producer of the waste, waste carrier etc.) and their relevant authorisation (e.g. permit number or carrier registration number).
- Documents must be retained for 2 years

Further information;

- Carriers should co-operate when asked for extra information. If the information is not given you may not be ensuring responsible disposal;
- Using a registered carrier does not remove your duty of care: ensure waste is disposed of appropriately;
- Periodic audits should be undertaken;
- Your responsibility does not end when the waste is transferred;
- Employers are responsible for acts and omissions of employees;
- A NRW registration is not a recommendation of a carrier

If you have doubts about who is carrying your waste or you would like to speak to an officer about how to ensure you are disposing of waste responsibly, you can do so by contacting your local Natural Resources Wales Office via the Customer Care Centre on 0300 065 3000.

*[If you would like a copy of this letter in Welsh, please contact me on the number below.]*

Yours faithfully,



Cathy Lloyd  
Environment Officer

Direct dial 0300 065 3555

E-mail: [cathy.lloyd@cyfoethnaturiolcymru.gov.uk](mailto:cathy.lloyd@cyfoethnaturiolcymru.gov.uk)

[www.cyfoethnaturiolcymru.gov.uk](http://www.cyfoethnaturiolcymru.gov.uk)

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg

[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

Correspondence welcomed in Welsh and English