

**P-05-753 Strengthening the Legislative and Regulatory Framework
Surrounding Waste Wood Processing Facilities – Correspondence from the
petitioner to the Committee, 25.01.18**

Dear Hannah,

Thank you for your email inviting further comments following the letter from the Interim Chief Executive of Natural Resources Wales.

As I have previously stated, my concern would be in relation to NRW's assertion that where an operator breaches their licence, they work to bring that operator back into compliance. They don't state how they do this and while I appreciate that NRW are unable to make any comment on the specifics of South Wales Wood Recycling (SWWR) due to an ongoing legal case, there is an issue relating to how they brought SWWR back into compliance. This, I contend, could have implications for other cases and so should not be treated in isolation. In their previous correspondence to the committee, they said that the increase in permitted throughput on the site was as a result of the extended site boundary, but it is clear from the attached permit (FP3095ET) that this related to the original boundary and not the extended one. This permit increased their throughput from 75000 tonnes to 120000 tonnes (see original permit from 2010 also attached). This was as a result of them breaching their permit. Obviously the original permit had limits for a reason and it doesn't seem reasonable practice to me to merely extend a permit to bring them back into compliance.

In addition to the permit issues, SWWR obtained a Category 3 score for inadequate fire breaks on 11/6/15 and 15/3/16. Category 3 means minor or minimal impact or effect on the environment, people and/or property, but it is not clear what was done about these issues although they say they came back into compliance after the issues were raised.

They had a category 2 score for exceeding their permitted tonnage on 5/9/16 (significant impact) and while I understand that Bridgend County Borough Council raised issues about the storage of material at the time, they didn't do anything about it. This also brings NRW's 'risk based approach' to managing such sites into question as the fire that subsequently occurred had clear impacts on people that I don't think any of us would assess as minor or minimal.

I would respectfully request that NRW are far clearer with the Committee about how they bring operators back into compliance in order for the Committee to ascertain whether our petition on strengthening the regulatory regime surrounding Waste

Wood Processing Facilities in general has any validity and should be explored in more detail by Welsh Government.

As always, if the Committee would like us to give oral evidence, please don't hesitate to get in touch and I will suggest a suitable witness.

Kind regards

Alex Williams

Cllr. Alex Williams (Penprysg Ward, Bridgend County Borough Council)