

Compliance Assessment Report CAR_NRW0048224

Permit being assessed: BB3793ND.

For: Nevills Dock, **held by:** AMG Resources Ltd.

At: A M G Resources Ltd, Nevills Dock, Llanelli, Carmarthenshire, SA15 2HD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 01/05/2025 between 12:15 and 13:15.

Parts of permit assessed: W1, W, 2, W3.

NRW Lead Officer: David Morgan.

Report sent to: Adrian Stewart, Technical Competent Manager, on 09/05/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3F - Waste - Emissions and monitoring - Pests	C2 Significant	3.1.2 (b)
W2C - Waste - Operations - Operating techniques	C2 Significant	2.3.1
W1A - Waste - Management - General management	C2 Significant	1.1.1 (a)

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

Total non-compliances recorded	Total non-compliance score
3	93

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
W3F	You must comply with your Pest Management Plan	06/06/2025
W2C	Maintain site infrastructure (site surfaces) to ensure all waste is stored in line with permit condition 2.3.1	06/06/2025
W1A	You must manage activities in accordance with written management systems that identify and minimise risks of	06/06/2025

Criteria	Action needed	Complete by
	pollution	

Compliance 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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

A site inspection was undertaken on Thursday 1st May 2025. Present at the time of the inspection were: David Morgan (natural Resources Wales), Adrian Stewart and Peter Nicholls (AMG Resources Ltd).

During the previous inspection, on 24th October 2024, a significant non-compliance of the Environmental Permit was recorded (Category 2 - Significant). This non-compliance was recorded for failing to comply with Operating Techniques as set out in the Environmental Permit (Table 2.3).

On 1st May 2025, this aspect of operations, and also compliance with Pest Management procedures, was assessed. The following observations were made:

Pest Management

At the time of inspection on 1st May 2025, it was noted that routine monitoring of pests (flies) had begun for the year.

A number of fly bags were inspected and all appeared to be in good condition. No bags were weather damaged or worn and all appeared to have been recently installed. Fly bags on the right side of the site (if facing the site from the office) were showing significant fly activity. It was noted that fly capture bags contained volumes of houseflies and green bottle flies.

Monitoring boards in this area were showing increased activity from fruit flies, but levels of house/green bottle flies on monitoring boards was low.

In the main waste storage area there were very large volumes of baled cans. It was noted that the volume of waste on site had increased significantly since the last inspection.

A large stack of residual 'contraries' waste was present on site and it was suggested by AMG Resources Ltd that this stack was approximately 100 tonnes. This waste was stored directly in a large pool of ponded site surface water. This area was odorous and there was very noticeable levels of flies. Evidence of fly breeding was not identified at the time of the inspection, although there was significant levels of flies on site.

It is noted that weather in recent weeks had been largely dry. Ponding of surface waters in this manner can encourage breeding of flies.

You are not compliant with your Pest Management Plan which states:

"5.6 Housekeeping

AMG recognises that sometimes it is the simple tasks that have the biggest influence on environmental protection. In the case of pests, it is ensuring that they are not provided with the habitat they seek.

For this reason, a comprehensive cleaning schedule will be implemented. This will include:

** Ensuring drainage is maintained to minimise surface water ponding..."*

At the time of inspection, there was several areas of ponded surface water despite weather being dry in recent weeks.

The Pest Management Plan also states all light fraction waste will be collected, there will be litter collections and all plant will be cleaned down to ensure there is no accumulation of tramp material.

At the time of inspection, there was large volumes of litter that had been blown off the concrete pad. Plant and equipment had signs of accumulated waste and did not appear to be routinely cleaned.

A non-compliance was recorded (Category 2 - Significant)(Ref:W3F) against Condition 3.1.2 (b) of your Environmental Permit

Operating Techniques

Several areas of the site were subject to ponding of site surface water. Not only can this encourage the breeding of pests (flies), but cracked/damaged site surfaces can also lead to contamination of land and groundwaters.

You are not compliant with Operating Techniques (Table 2.3) in your Environmental Permit that states all wastes shall be treated on an impermeable surface with a sealed drainage system. This non-compliance was identified in the previous inspection (24th October 2024) and has not been rectified.

A non-compliance has been recorded (Category 2 - Significant)(Ref:W2C) against Condition 2.3.1 of your Environmental Permit

General Management

In recent years several significant non-compliances of the Environmental Permit have been recorded on site.

Issues that have been raised in previous inspections, such as compliance with the Pest Management Plan, compliance with Operating Techniques have not been addressed and maintained. Individual aspects of non-compliance such as general housekeeping (litter collection), maintaining site drainage are often assessed as non-compliant.

In our discussion after the site inspection, it was suggested that routine visual inspections of the site are undertaken, yet clear non-compliances have not been identified and actioned.

As a result, a non-compliance has been recorded as a failure in general management of the site is deemed the root cause of continued non-compliance.

A non-compliance has been recorded (Category 2 - Significant)(Ref:W1A) against Condition 1.1.1 (a) of your Environmental Permit

It is recommended that a full review of general management is now undertaken. You must ensure you are compliant with the Pest Management Plan, Environment Management System and Environmental Permit.

END OF REPORT

Any compliance criteria not highlighted in the above summary should be considered as not assessed. In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012. You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1 st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 18:00), or email 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

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.