

Compliance Assessment Report CAR_NRW0048797

Permit being assessed: HB3490HK.

For: Abertawe Metals Recycling Ltd, **held by:** Abertawe Metal Recycling Limited

At: Dyffryn Close, Swansea Enterprise Park, Swansea, Swansea, SA6 8QG.

Type of assessment: Site Inspection,

Reason: Routine.

On: 25/06/2025 between 11:00 and 11:30.

Parts of permit assessed: Specified by permit.

NRW Lead Officer: Angharad Clark, accompanied by Hugh Martin.

Report sent to: James Lerner, Operator, on 11/07/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3A(1) - Waste - Emissions and monitoring - Emissions to water	C2 Significant	2.1.1 Table S1.2 (a) and (b)

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

Total non-compliances recorded	Total non-compliance score
1	31

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
W3A(1)	Map drainage system and provide evidence of sealed drainage system or trade effluent discharge consent	15/01/2026

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.

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

On 25th June 2025 Angharad Clark and Hugh Martin attended Abertawe Metal Recycling and met with the operator.

Site

The site was in good condition with good segregation of waste. Planning was discussed for the erection of a new shed with a sealed drainage system and demolition of the old shed.

EMS and FPMP

Following the inspection Angharad Clark has made contact with the site consultant. Copies of the EMS and FPMP have been obtained. These have been forwarded to the site. Please note these are working documents and should be updated as and when any changes are made to operations or infrastructure. Please keep hard copies of these documents on site and ensure all employees are familiar with them, as per permit condition 1.1.3 *"Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out."*

Site drainage

W3A - Emission to water, air or land - Permit Condition 2.1.1. Table S1.1 (a) and (b) - Category 2 breach.

The Operator has not provided evidence of a trade waste agreement with Dwr Cymru Welsh Water or evidence of a sealed drainage system. Failure to demonstrate that you have a discharge consent or other sealed drainage system would be a breach of permit condition 2.1.1 Table S1.1 (a) and (b), until such time as this information is provided.

Permit condition 2.1.1 Table S 1.1 (a) and (b) states all storage and treatment of hazardous and non-hazardous wastes shall be on an impermeable surface with sealed drainage.

The drainage system on site needs to be mapped to understand the layout of the drainage as the Operator is currently unable to prove that no effluent is leaving site. Once this has been completed, evidence of a sealed drainage system or a trade effluent consent should be provided to NRW.

ACTION: Undertake mapping of site drainage and report to NRW of confirmed sealed drainage system or trade effluent consent by 15th January 2026.

It has been noted that there has been a vast improvement on the operations at the site, it is clear that the site is being pro-active with the management of the operations.

END

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.