

Compliance Assessment Report CAR_NRW0048947

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: 11/07/2025 between 10:30 and 12:00.

Parts of permit assessed: W1, W2 & W3.

NRW Lead Officer: David Morgan, accompanied by Hugh Martin.

Report sent to: Adrian Stewart, Technical Competent Manager, on 24/07/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Assessed (A)	
W2A - Waste - Operations - Permitted activities	C3 Minor	2.4.1
W2C - Waste - Operations - Operating techniques	Ongoing (O)	2.3.1
W3F - Waste - Emissions and monitoring - Pests	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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
W2A	Remove waste from outside permitted boundary	05/12/2025
W2C	Maintain site infrastructure (site surfaces) to ensure all waste is stored in line with permit condition 2.3.1	05/12/2025

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

A routine site inspection was undertaken on Friday 11th July 2025. The purpose of the inspection was to reassess non-compliances recorded during the previous inspection on Thursday 1st May 2025.

The findings of the previous inspection were recorded in Compliance Assessment Report ref: CAR_NRW0048224.

Previous Inspection

During the previous inspection of 1st May 2025, non-compliances were recorded against the following areas of operations:

- **Operations were not compliant with the site Pest Management Plan (PMP)** as large volumes of contraries waste appeared to have been stored on site for too long and was odorous. This was stored in an area where there was a large amount of ponded/standing water which can attract flies.

On Friday 11th July 2025, Natural Resources Wales assessed this aspect of operations as being compliant with the Pest Management Plan. There was no standing water despite the area being subject to rainfall in previous days. This suggests rain water and standing water had been removed and tankered off site.

- **Site infrastructure (site surfaces) was damaged and not preventing ingress of potentially contaminated water into unmade ground and the site does not benefit from a sealed drainage system** (the permit requires all waste to be treated on impermeable surfaces with sealed drainage system).

On Friday 11th July 2025, Natural Resources Wales assessed this aspect of operations as an ongoing (O) non-compliance. This was not recorded as a non-compliance. Given the nature of operations and expense of infrastructure works, Natural Resources Wales is satisfied that there is now plans in place for the Operator to improve infrastructure (drainage).

Site Inspection

On Friday 11th July 2025, a site inspection was undertaken and the following observations were made:

Pest Management

Operations were assessed as being compliant with the site Pest Management Plan. There was a small amount of contrary waste (which typically attracts flies) on site and this suggests this waste is regularly removed from site.

Fly capture bags and monitoring boards were in place and looked relatively new. Capture bags were not weathered, damaged or showing signs of having been in place for a long period of time.

Generally, housekeeping had improved and areas behind concrete walls and in corners of the site appeared to be well maintained.

A very small amount of flies was noted on site but there was no signs of fly breeding on site.

Waste Storage

On Friday 11th July, a significant volume of waste was being stored outside the permitted area. At the time, risk associated to this activity appeared to be low and minor in nature. It was noted that you intend to vary the Environmental Permit to include this area in Operations.

On this occasion, a minor breach of the permit was recorded as risk posed by this activity appears to be minor, however, in future inspections, we may wish to reassess this activity and infrastructure in this area.

A non-compliance was recorded against condition 2.4.1 of the Environmental Permit (Category 3 - Minor)(Ref:W2A)

2.4 The site

2.4.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan attached to the permit.

You must remove waste from outside the site boundary and/or vary your Environmental Permit to incorporate this area. Operations in any new areas of the site must comply with the conditions of the permit, specifically infrastructure requirements.

Summary

On Friday 11th July 2025, operations were assessed as compliant with the requirements of the Pest Management Plan. Housekeeping and other pest mitigation measures have

improved. There was no signs of flies breeding on site during the inspection.

The site does not benefit from a sealed drainage system, however, plans are now in place to rectify this issue.

A minor non-compliance was recorded as waste was being stored outside of the permitted area. The infrastructure (site surface) in this area will be further inspected in a future inspection although risk associated with this non-compliance is deemed to be minor.

Thank you for your time during the inspection.

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.