

Compliance Assessment Report CAR_NRW0049017

Permit being assessed: AB3797ZE.

For: KDK Metals Unit, **held by:** KDK Metals Limited

At: K D K Metals, East Bank Road, Felnex Industrial Estate, Newport, Newport, NP19 4PP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 22/07/2025 between 10:30 and 11:15.

Parts of permit assessed: Various.

NRW Lead Officer: Carla Curtis, accompanied by Mark O'Gorman, Cerys Phillips.

Report sent to: Paul Dare, Site Manager, on 05/08/2025.

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	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W4A - Waste - Information - Records	Action only (X)	
W4B - Waste - Information - Reporting	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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
W4A	Please send an up-to-date copy of your WAMITAB certificate to NRW officer following the issue of this CAR form.	31/08/2025

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

This report details the site visit made on the 22nd of July 2025 to KDK Metals Ltd, Newport, permit reference number EPR-AB3797ZE.

NRW Officers Carla CURTIS, Mark O'GORMAN and Cerys PHILLIPS attended the KDK Metals Ltd site at East Bank Road, Felnex Industrial Estate, Newport, NP19 4PP for an unannounced routine site inspection at 10:30 where we met with the Site Manager, Mr. Paul DARE. The weather was warm and overcast.

SITE INSPECTION

NRW Officers inspected the site with Mr. DARE where housekeeping was to an improved standard as compared to the previous site inspection, road deposits were kept to a minimum and stockpile heights of waste(s) on site were in line with the sites FPMP (Fire Prevention and Mitigation Plan). NRW Officers did not witness any excessive noise levels that were of concern or any excessive unpleasant odours.

Mr Dare advised that he has sold off half of the site to a Taxi firm, the area where Mr Dare operates is now significantly smaller, Mr Dare advised that he is working with an Environmental Consultant to look into either a partial surrender or to do a variation of the permit, please see section below for Permit variation and partial surrender details.



Photo 1 - On site housekeeping at KDK Metals Ltd



Photo 2 - On site housekeeping at KDK Metals Ltd



Photo 3 - On site housekeeping at KDK Metals Ltd



Photo 4 - On site housekeeping at KDK Metals Ltd



Photo 5 - On site housekeeping at KDK Metals Ltd

PERMIT VARIATION / SURRENDER

As advised on previous CAR form CAR_NRW0043816: Waste exemptions are changing and this will affect anyone who carries out a waste exemption activity. Defra has published its consultation [supplementary response document](#) and [associated annexes](#) explaining these changes. It sets out which exemptions will be withdrawn or restricted. We expect changes to the exemptions will start to roll out during 2025, but timescales have not been finalised yet. Ultimately permitted sites, such as KDK Metals Ltd, will not be able to hold an environmental permit and registered waste exemptions. When these changes come into force the environmental permit will supersede any registered waste exemptions. Therefore, either the environmental permit is varied to add / remove certain waste codes and different operating techniques or the permit is surrendered, and the site is operated under waste exemptions providing the site can comply with the criteria in said registered waste exemptions. If KDK Metals Ltd intends on surrendering his environmental permit, then the site would have to be completely cleared, and a site condition report submitted to NRW which would indicate that there was no contamination remaining prior to the surrendering. A final site inspection would be undertaken to determine if the site had been appropriately remediated. Details of a full and partial surrender of the permit can be found on the attached link - [Natural Resources Wales / Apply to surrender \(give up\) all or part of a waste permit](#) If KDK Metals Ltd intend to vary their permit (for example, change permit boundary / add or remove waste codes) then a permit variation application would be required. Details of varying / changing a waste permit can be found on the attached link - [Natural Resources Wales / Apply to change to, or vary, a bespoke waste permit](#)

PERMIT BREACHES / ACTIONS

No permit breaches / actions have been identified during this site inspection.

WAMITAB

The site TCM (Technically Competent Manager) is Mrs. Helen Seignot-Dare.

ACTION: Please send an up-to-date copy of your WAMITAB certificate to NRW officer following the issue of this CAR form.

WASTE RETURN SUBMISSIONS

KDK Metals Ltd have submitted their latest waste return for 2025 on time and in full. The site received a total of 0 tonnes of ELV waste with 0 tonnes of ELV waste removed. There was no unauthorised waste streams identified within the submission.

If you have any issues with this report please contact Carla Curtis on carla.curtis@naturalresourceswales.gov.uk Thank you.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

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.