

Compliance Assessment Report CAR_NRW0049738

Permit being assessed: EP3935UC.

For: Waunarlwydd Works, **held by:** Swan Alloy Uk Ltd

At: Waunarlwydd Works, Westfield Industrial Park, Waunarlwydd, Swansea, SA5 4SF.

Type of assessment: Site Inspection,

Reason: Incident Response (Incident number 2509266).

On: 21/10/2025 between 11:10 and 12:50.

Parts of permit assessed: See section 4.

NRW Lead Officer: Kirsty Thomas, accompanied by Daren Pike.

Report sent to: Swan Alloy UK Ltd, HSE Manager, on 23/10/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Action only (X)	

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
IR1A	Swan Alloy to undertake a thorough review and update of their Pest Management Plan (PMP) to ensure robust measures are in place for preventing and minimising the presence of pests, particularly flies.	10/11/2025

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 Compliance Assessment Report (CAR) details the comments of Natural Resources Wales (NRW) Officers for the site inspection conducted on 21 October 2025 at Swan Alloy, Waunarlwydd Works, Waunarlwydd, Swansea, SA5 4SF for activities held by Swan Alloy UK limited (the operator) under the environmental permit EPR-EP3935UC.

NRW Officer attended the site following reports of fly issues within the Westfield Industrial Estate where the Swan Alloy site is located.

Site Activities

The site receives aluminium materials which are processed on-site by metallurgical means to recover aluminium. This includes the acceptance on site of used beverage cans, typically delivered in bales by various suppliers such as local authorities. Other secondary sourced aluminium scrap is also accepted on site.

The site convert the aluminium scrap and by-products into reusable aluminium metal and deliver it back customers.

Site Observations

Bales of aluminium cans were observed on-site, stored within the designated storage area.



Image 1 - Baled aluminium cans

The bales are accepted on site via the operators waste acceptance procedures. The operator explained the site has quality and analysis teams to assess the incoming waste deliveries. The bales of aluminium cans are assigned a reference number linking them to the supplier and then stored on site. Any unacceptable waste is quarantined and dealt with appropriately.

Recommendation - Swan Alloy should review the sources of incoming waste, particular the aluminium cans and identify any suppliers or producers whose materials are more likely to be contaminated, including contamination with organic residues or the presence of flies. These sources should be assessed and incorporated into the site's waste acceptance procedures (if not already) to ensure appropriate controls are in place and reduce pest attraction.

Some loose material had detached from the bales and was scattered intermittently across the ground.



Image 2 - loose material

NRW Officers queried how the site maintains good housekeeping and what cleaning procedures are in place within the waste and raw material storage areas. The site explained that general housekeeping is managed using a forklift fitted with a brush attachment to collect loose material from the ground. This is followed by a jet sweeper, which washes and sweeps the floor surfaces. Both pieces of equipment were observed to be in active use upon arrival and throughout the inspection.

Waste is also collected and stored in two purpose-built clean-up bays. The operator explained that the material stored in these bays is actively used in the site's processes, and as such, the stock is regularly turned over.

Fly activity was observed on-site, with flies present in the area. It is likely that the waste cans are acting as an attractant. A significant amount of flies were present at the time of this inspection.



Image 3 - Flies

NRW Officers did not observe the presence of any larva/pupa. Therefore NRW Officers could not confirm the site as the source of the flies.

NRW Officers expressed concern about the number of flies observed on-site and asked whether a pest management plan was in place. The site confirmed that a plan exists and committed to reviewing and updating it as necessary.

Action – Swan Alloy to undertake a thorough review and update of their Pest Management Plan (PMP) to ensure robust measures are in place for preventing and minimising the presence of pests, particularly flies.

Salt slag storage

The site is permitted to store up to 25,000 tonnes of salt slag produced on-site prior to its removal. During the inspection, NRW Officers observed salt slag stored within the designated storage building and queried the operator regarding the site's storage capacity limit. The operator explained that the quantity of salt slag entering and leaving the site is recorded, and claimed that current storage levels remain within the permitted threshold.

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

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – 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.