

Compliance Assessment Report CAR_NRW0050021

Permit being assessed: LP3098FJ.

For: Rees Metals, **held by:** Rees Metals Ltd

At: Pencoed Works, Bellvue Road, Llanelli, Carmarthenshire, SA14 9LN.

Type of assessment: Site Inspection,

Reason: Routine.

On: 21/11/2025 between 11:50 and 13:30.

Parts of permit assessed: W1A, W2E, W4A, W4B.

NRW Lead Officer: David Morgan.

Report sent to: Len Davies, Business Owner, on 01/12/2025.

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	C2 Significant	1.1.1
W2E - Waste - Operations - Waste acceptance	C2 Significant	1.2.3
W4A - Waste - Information - Records	C2 Significant	1.4.2
W4B - Waste - Information - Reporting	C4 No impact	7.2.4

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

Total non-compliances recorded	Total non-compliance score
4	93.1

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
W1A	You must undertake a comprehensive review of operations and comply with ALL conditions listed in your Environmental Permit	10/07/2026
W2E	You must not accept wastes that are excluded in your Environmental Permit (see Table 2.1.B)	10/07/2026

Criteria	Action needed	Complete by
W4A	You must ensure copies of your Environmental Permit and Environment Management System (formerly referred to as 'Working Plan') are available on site	10/07/2026
W4B	You must submit all outstanding Waste Returns information	10/07/2026

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.

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 routine site inspection was undertaken on Friday 21st November 2025 by David Morgan and Alex Underhill.

Parts of the permitted activity that were assessed included General Management, The Site (site infrastructure), Records (Documents & Waste Returns Information). An inspection of the operational areas of the site was undertaken following which certain documentation related to the operation of the site was requested.

The following observations were made:

Permit Compliance

On Friday 21st November 2025, several areas of operations were assessed as being not compliant with the Environmental Permit.

Operations were assessed as not being compliant with the following permit conditions below (appearing in order as listed in the Environmental Permit):

Condition 1.1.1 (a)

Condition 1.1.1 states that operations must be undertaken in accordance with the limitations of Table 1.1.

Table 1.1 (a) states all waste must be stored in areas of the site that benefit from a hardstanding or impermeable pavement surface. At the time of the inspection, large volumes of waste were being stored on unmade ground, posing a risk of land contamination.

Table 1.1 (c) states that all treatment of waste (listed in the permit as 'size reduction', 'cutting', 'shearing') will only take place on areas of the site that benefit from an

impermeable pavement and sealed drainage system. During the inspection, it was noted that the site operates mobile cutting/shearing plant and metal is cut where it is stored on site. This area does not have impermeable surface and sealed drainage system.

Condition 1.2.3

Condition 1.2.3 refers to Table 1.2.B, a list of wastes that are excluded from site. These wastes must not be accepted on site.

One waste stream in this list is 'Finely divided metals' (including ferrous and non-ferrous swarf).

During the inspection, significant volumes of this waste type were present on site. This waste was not stored on hardstanding or impermeable surfaces and large volumes were strewn across unmade ground. This could potentially contaminate land.

Also on site, amongst stacks of mixed metal waste, there appeared to be End-of-life vehicles present. It is unknown if these vehicles were depolluted shells. This waste is also excluded from site.

Condition 1.4.2

Following an inspection of the yard, documentation related to the operation of the site was requested. When requested, copies of the Environmental Permit and Environment Management System (formerly referred to as the Waste Management Licence and Working Plan) were not made available. Copies of these documents could not be located on site.

Condition 1.4.2 of the permit requires copies of these documents to be kept on site and made available to staff.

Condition 2.1.2

Condition 2.1.2 states site containment and drainage systems (including site surfaces) shall be designed, built and maintained in accordance with the standards specified in Table 2.1.

Table 2.1 (a) states that **Hardstanding** will be constructed and maintained in a manner so the site surface will: remain even, shall not be subject to rutting by vehicles, be durable so it can be cleared and shall remain free from standing water.

At the time of the inspection, areas of hardstanding were not being maintained to this standard.

It is noted that the shearer on site is not currently being operated, however, the permit does require that the bund underneath the shears is free from rainwater and constructed in a way that prevents ponding. This area was subject to ponding of site surface water at the time of the inspection although it did not appear to be posing any significant environmental

impact.

Condition 7.2.4

At the end of each financial year, you must submit Waste Returns, records of all waste that has entered and been removed from site. Our records indicate that Waste Returns information has not been submitted since September 2020.

You must submit all outstanding Waste Returns information.

Record of Non-compliance

The following non-compliances have now been recorded against your permit:

A non-compliance (Category 2 – Significant)(Ref:W1A) was recorded against Condition 1.1.1 of the Environmental Permit

Several non-compliances have been recorded against areas of the permitted activity such as infrastructure, waste acceptance, records management. The root cause of these non-compliances is deemed to be a failure to manage the site in line with the requirements of the permit and in a way that prevents environmental impact (potential contamination of land and groundwater).

A non-compliance (Category 2 – Significant)(Ref:W2E) was recorded against Condition 1.2.3 of the Environmental Permit

Significant volumes of excluded wastes, such as finely divided metals (swarf and End-of-life vehicles are present on site and they are stored in areas of the site that do not benefit from sufficient infrastructure. Swarf metals are strewn across muddy areas of unmade ground.

A non-compliance (Category 2 – Significant)(Ref:W4A) was recorded against Condition 1.4.2 of the Environmental Permit

Copies of the Environmental Permit and Environment Management System were not available when requested. Given the volume of non-compliances on site, and potential environmental impact, this has been recorded as Category 2 - Significant.

A non-compliance (Category 4 – No Impact)(Ref:W4B) was recorded against Condition 7.2.4 of the Environmental Permit

Waste Returns information has not been submitted since 2020.

Summary

A routine site inspection was undertaken on Friday 21st November 2025. Several non-compliances with conditions of the Environmental Permit were recorded.

Site infrastructure is not being maintained to standards set out in the Environmental Permit and metal waste is being stored and treated (using mobile cutting) in areas of the site where there is unmade ground. This poses a risk of land contamination.

Documentation and records are not being kept and were not available for inspection. The root cause of non-compliances has been attributed to a failure in General Management of the site.

It is recommended that you undertake a comprehensive review of operations on site. It is likely Natural Resources Wales will now serve an Enforcement Notice on you requiring you to comply with your permit.

Failure to comply with permit conditions and/or an Enforcement Notice may result in further enforcement action being taken against you. Natural Resources Wales is now considering taking enforcement action against you in relation to non-compliances of the permit recorded on Friday 21st November 2025.

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.