

Compliance Assessment Report CAR_NRW0050396

Permit being assessed: FP3695LM.

For: Clydach Metals Recycling Facility, **held by:** Clydach Metals Ltd

At: Players Industrial Estate, Clydach, Swansea, West Glamorgan, SA6 5EJ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 12/01/2026 between 13:25 and 14:30.

Parts of permit assessed: W1A, W2A & W2C.

NRW Lead Officer: David Ellar, accompanied by Alex Underhill.

Report sent to: Rebecca Davies, Operator, on 19/01/2026.

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)	

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?

No action required.

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 was an unannounced, site visit made by David Ellar and Alex Underhill of Natural Resources Wales (NRW). The purpose of the inspection was to assess compliance against the tier 3 bespoke Environmental Permit (FP3695LM).

The weather was fine but recent heavy rain had made the site wet.

Previous inspection:

No permit breaches were observed during the last inspection dated 05/04/2024 Please see Compliance Assessment Report CAR_NRW0043954 for further detail.

Permit Breaches:

No permit breaches were recorded during this inspection.

General observations:

This was the first inspection since the permit was transferred to Clydach Metals Limited which was on 06/08/2025.

The site was generally clean and well organised with good segregation of waste types and good waste storage practices were observed.

Parts of the impermeable pad were worn and damaged and in need of repair, however it was believed that the wear in these areas had not yet compromised the integrity of the impermeable surface.

Recent improvements to the pad had been undertaken. The operator has only recently taken over the site and was still in the process of 'organising' the yard. It is the intention of the operator to inspect and review the condition of the pad as parts of the site become clear from inherited waste; Any repair identified will form part of the site maintenance schedule.

Some legacy wastes such as PVC window frames remain on site from the previous operator, it was likely that these materials were stored under waste exemptions. This waste was segregated from the other waste operations on site. Clydach Metals does not have an exemption in place for storing / treating PVC window frames and they are not permitted to be received under the permit. The operator explained that they were still in the process of clearing unwanted, legacy wastes and the rest of the PVC window frames would be removed from site. The current operator did not bring this waste onto the site and it is not the intention of Clydach Metals to store or treat these waste types.

Photograph of the PVC window frames:

**EMS:**

The site has a newly updated EMS (dated August 2025 V1) but it has not yet been reviewed or accepted by NRW. The EMS is an updated version of the previous operators one. The EMS will be reviewed as part of a future inspection.

Depollution of ELV's:

At present very few ELV's are taken in or depolluted. The depollution area was clear and well organised. Waste storage containers were clearly marked on a grid bund. It was recommended the ELV depollution process (noted in the site EMS) is printed out and put on wall of ELV area so staff can ensure full process is followed.

Technical competence:

Gareth Hill is the current TCM for the site and holds the appropriate WAMITAB certification.

Waste Returns:

The operator is required to submit quarterly waste returns, there is nothing on file so far for Clydach Metals. Q3 waste returns are outstanding and Q4 waste returns must be submitted by the end of January. Waste return compliance will be reviewed during our next inspection.

Many thanks for your time during the inspection.

Ends.

In this document 'Natural Resources Wales' means the Natural Resources 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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.