

Compliance Assessment Report CAR_NRW0050432

Permit being assessed: GP3095FF.

For: 1st Choice Vehicle Dismantlers, **held by:** Malcolm David Harrison

At: Units 12/13, Tremorfa Ind Estate, Cardiff, Glamorgan, CF24 5SD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 18/12/2025 between 13:10 and 14:20.

Parts of permit assessed: All.

NRW Lead Officer: Gareth Morris, accompanied by Simon Powell, Marc Campbell.

Report sent to: James Harrison, Site Operator , on 21/01/2026.

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	C3 Minor	Permit Condition 1.1.1
W1A - Waste - Management - General management	C3 Minor	Permit Condition 1.1.3
W4B - Waste - Information - Reporting	C3 Minor	Permit Condition 6.2.2

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

Total non-compliances recorded	Total non-compliance score
3	12

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	Produce an up to date, comprehensive EMS	30/01/2026
W1A	The site must have a TCM in place in order to compliant with their permit	30/01/2026
W4B	All Waste returns from 2016-2026 must be produced.	30/01/2026

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

Malcolm David Harrison (First Choice Vehicle Dismantlers) Site Visit, Cardiff
(GP3095FF)-18/12/2025

Waste Regulation Officer Gareth Morris accompanied by Waste Regulation Officer; Marc Campbell visited Malcolm David Harrison (First Choice Vehicle Dismantlers) Units 12 & 13, Martin Road, Tremorfa Industrial Estate, Rover Way, Cardiff, CF24 5SD to conduct a routine site inspection and to assess compliance with environmental permit; GP3095FF.

The site is a Metal Recycling Site.

On arrival at site, we were met by the site owners.

The weather on day of inspection was overcast with heavy rain.

Breaches Recorded

W1A- General Management

Route Cause Breach 1.1.1

Permit Condition 1.1.1 (A) states: *The operator shall manage and operate the activities:*

- a. *In accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure, and those drawn to the attention of the operator as a result of complaints.*

Permit Condition 1.1.2 states: *Records demonstrating compliance with rule 1.1.1 shall be maintained.*

During my inspection of the site, I asked for access to the permitted site's environmental management system (EMS) and all other paperwork relating the permitted site. The site's environmental management system was produced, but was out of date and needs to be updated.

Action: I informed the permit holder that it was vital that the site permit, environmental management system and other associated documentation are always available and up to date. As

the permit holder had breached this permit condition, I informed them that they would receive a Category Three (3) breach for this breach of permit condition.

Permit Condition 1.1.3 states: ***All site staff shall be, or shall work under the direct supervision of a member of staff who is, fully conversant with those aspects of the license conditions and working plan which are relevant to their specific duties.***

I asked the permit holder for a copy of their WAMITAB certification, and they informed me they did hold a WAMITAB certification.

Action: I informed the permit holder that they were in breach of their permit and environmental management system (EMS) by not holding a WAMITAB certification. I instructed the permit holder that they must hold a WAMITAB certification, or employ someone with the correct accreditation to be compliant with their permit and environmental management system. I informed the permit holder that they would receive a Category Three (3) breach for this breach of permit.

W4A-Records

Permit Condition 6.2.2 states: ***A summary of the information, including nil returns, shall be submitted to the Agency, in the format specified by the Agency in Annex 1 which forms part of this condition. Summaries shall be for each financial year and shall be submitted to the Agency within one Month of the end of each financial year.***

The site has not submitted waste returns for the financial year 2023-2024. Upon closer inspection, there is no record of any waste returns being submitted since 2016. You are required by your permit condition 6.2.2 to submit waste returns annually. As the waste returns for financial year 2023-2024 were not submitted, you will therefore receive a Category Three (3) breach for failure to comply with this permit condition.

If you have any queries relating to this report, please do not hesitate to contact myself on the details below.

Gareth Morris

07966730983

Gareth.morris@naturalresourceswales.gov.uk

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.