

Compliance Assessment Report CAR_NRW0050886

Permit being assessed: GP3193MV.

For: M & R Commercials Vehicle Dismantling & Recycling Facility, **held by:** T M Wiberg Limited

At: Plots P & W, Nant Y Felin, Swansea, W Glamorgan, SA5 4HG.

Type of assessment: Site Inspection,

Reason: Routine.

On: 26/02/2026 between 10:30 and 11:40.

Parts of permit assessed: W1A, W2A & W3G.

NRW Lead Officer: David Ellar, accompanied by Edward Davies.

Report sent to: Mal Wiberg, Director, on 13/03/2026.

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	C2 Significant	1.1.1
W2A - Waste - Operations - Permitted activities	C2 Significant	2.1.1 and table 2.1
W3G - Waste - Emissions and monitoring - Fire	C2 Significant	3.4.1

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

Total non-compliances recorded	Total non-compliance score
3	93

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	Ensure that operations on site are conducted in line with an updated EMS that is produced in line with the guidance provided by NRW.	30/06/2026
W2A	Ensure that all wastes are removed and stored in accordance	30/06/2026

Criteria	Action needed	Complete by
	with permit condition 2.1.1	
W3G	Ensure that the site is operated in line with the current FPMP.	30/06/2026

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

An announced, routine, site inspection was undertaken on 26 February 2026 to assess compliance against the Standard Rules Permit (SR2011No3 – vehicle storage, depollution & dismantling (authorised treatment) facility) - Permit No: GP3193MV held by T M Wiberg Limited. Present at the time of the inspection were: David Ellar and Edward Davies (Natural Resources Wales) and the Director (T M Wiberg Limited).

The weather was wet with recent heavy rainfall.

Permit breaches identified:

General Management - W1A - Category 2

Condition 1.1.1 of the permit 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.

The EMS for the site is dated December 2012 and does not fully reflect current waste operations at the site. Consultants have previously confirmed with NRW that they will be working towards developing a new Environmental Management System (EMS) in line with the current working practices of the site but this is yet to be submitted to NRW.

Ongoing non-compliances at the site are a direct result of the operator failing to operate in line with a written management plan that both identifies and reduces the potential pollution risk to the environment. This failure represents a significant lapse in management and operational control reducing the sites ability to maintain effective pollution prevention measures and increasing the likelihood of significant environmental incidents.

Previous inspections have highlighted the need for an updated EMS, meaning the operator has failed to act on known risks.

This has been scored as a Category 2 breach of condition 1.1.1 (a).

Action - Update the Environmental Management System so that it accurately reflects current site activities and control measures and is in line with current NRW guidance and submit to NRW to review.

Waste Operations - W2A & W2C - Category 2

There is a significant volume of waste stored at the rear of the building on an area of impermeable surface which had been in situ in excess of the allowed storage period under the permit. Permit condition 2.1.1 and Table 2.1 state: 'that wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery'.

Whilst it is apparent that some waste has been processed and removed from site, a considerable amount remains in place despite previous actions placed on the operator to remove it. The operator has confirmed that a trommel had been brought on to site and used to sort the waste but recent wet weather conditions had affected the task. The operator explained that trommel will be coming back to site and the rest of the waste will be screened and removed when weather conditions allow.

Waste that remains on site beyond permitted timeframes is more likely to degrade, generate leachate, increase fire risk and potentially cause pollution.

This has been scored as a Category 2 breach of permit condition 2.1.1.

Action - Ensure that all wastes are removed and stored in accordance with permit condition 2.1.1.

Photographs of the waste pile:





Fire - W3G – Category 2.

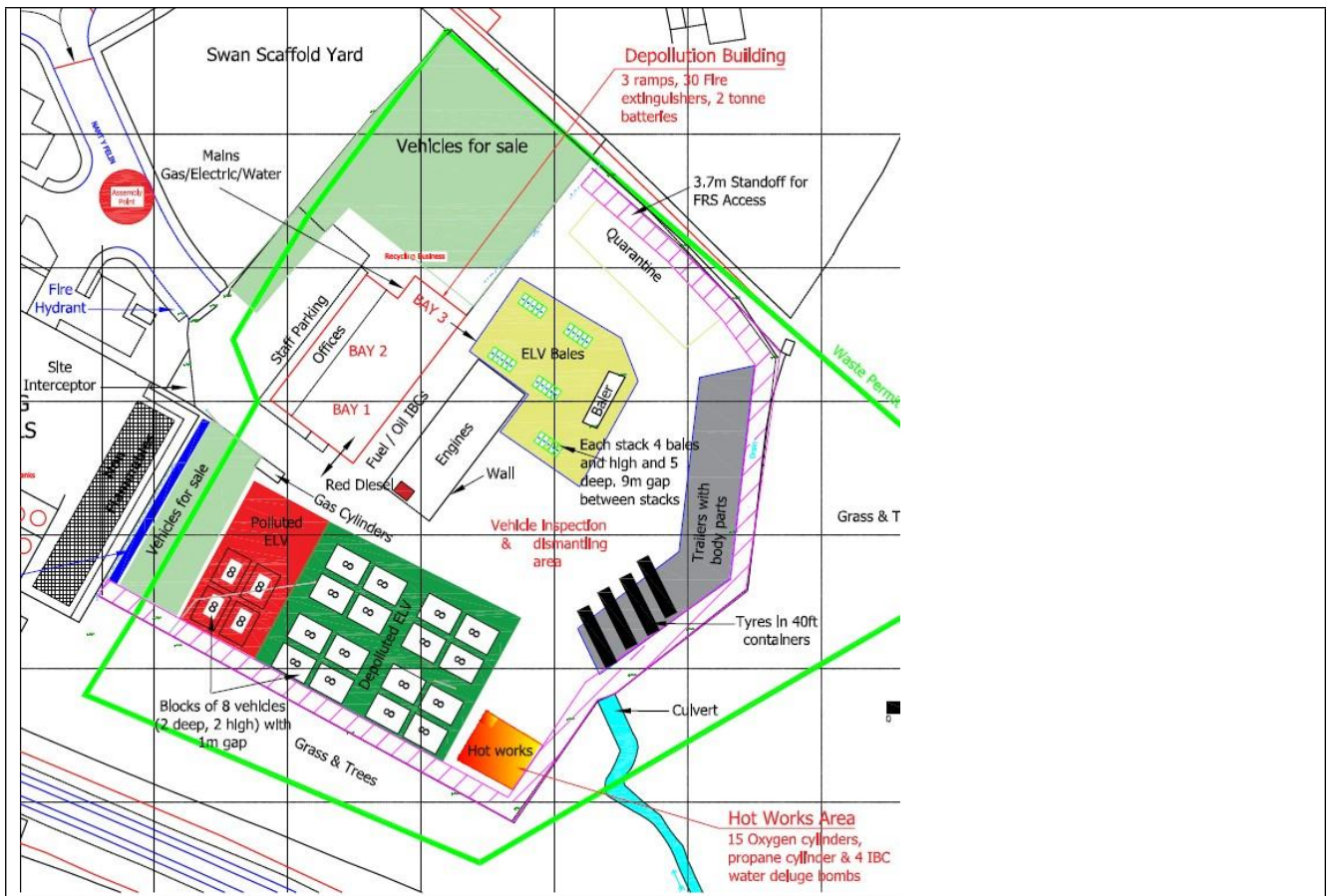
Condition 3.4.1 of permit states 'The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance. The site does have a Fire Prevention and Mitigation Plan (FPMP) dated February 2019 (referenced as: 1877r1v1d0219), which details mitigation measures set out to reduce fire risk. The site however was found not to be operating in accordance with the current FPMP during the inspection.

Onsite waste storage practices were found not to be reflected by the FPMP and the 3.7m Standoff was not in place. 'Figure 2' of the FPMP is a plan of the site showing waste storage and a 3.7m standoff around the perimeter of the site for FRS access. The standoff distance is a critical element of approved fire mitigation design. Failure to maintain it significantly reduces the site's ability to comply with fire prevention guidance and increases the chance of a serious fire incident.

This has been scored as a Category 2 breach of permit condition 3.4.1.

Action - Ensure that the site is operated in line with the current FPMP.

Copy of Figure 2 of the FPMP:



Given the significance of the breaches above, NRW will have to consider its enforcement response. You will be written to separately regarding this decision.

Previous inspections:

An inspection was carried out in December 2025, but for unforeseen circumstances, the CAR could not be completed and was not issued to the operator. Previously to this the last complete site inspection was on the 09 September 2025 where compliance against a Environmental Permitting (England and Wales Regulations 2016 Regulation 36 notice was checked. The notice required steps to be undertaken, and it was found that the notice and required steps had not been complied with. Several significant permit breaches were also recorded during the visit, please see Compliance Assessment Report CAR_NRW0049328 for further detail.

General observations:

The site was very wet, especially to the rear of the site, this was leading to large puddles and standing water. The operator explained that this was partially due to a culverted water course at the rear of the site which occasionally floods. This is an ongoing issue which the operator is trying to solve with neighbouring properties and the Local Authority.

Vehicle depollution takes place in the treatment shed, no vehicles were being depolluted at time of inspection so the process was unable to be fully assessed. Whilst there is provision for storage of ELV wastes e.g. batteries in batteries boxes and double bunded tanks for liquid storage the area is not well organised and it is unlikely that efficient depollution of

ELV could take place. Before the operator undertakes ELV depollution it is recommended that they have reviewed the Technical Requirements detailed in rule 2.4 of permit and the operating techniques detailed in table 2.3 of the permit.

Thank you 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.