

Compliance Assessment Report CAR_NRW0051435

Permit being assessed: AP3798FB.

For: E.J. Metals Recycling Ltd, **held by:** EJ METALS RECYCLING LTD

At: Creuddyn Bridge, Lampeter, Ceredigion, SA48 8BA.

Type of assessment: Site Inspection,

Reason: Routine.

On: 09/04/2026 between 14:00 and 14:45.

Parts of permit assessed: See criteria listed below.

NRW Lead Officer: Luke Taylor.

Report sent to: Evan Jones, Site Operator , on 30/04/2026.

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 | Paragraph 2 (6)(b) of Part 3 Schedule 9 Environmental Permitting Regulations 2016 |
| W2C - Waste - Operations - Operating techniques | Action only (X) | |
| W4B - Waste - Information - Reporting | C3 Minor | 6.1.1 |

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

| Total non-compliances recorded | Total non-compliance score |
|--------------------------------|----------------------------|
| 2 | 8 |

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 | Obtain the continued competency qualification or arrange for the services of a suitably qualified person to act as TCM | 31/07/2026 |
| W2C | Inspect and repair the building roof | 31/05/2026 |

| Criteria | Action needed | Complete by |
|----------|---|-------------|
| W4B | Submit all outstanding waste returns to NRW using the supplied template | 31/05/2026 |

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 is being produced following an inspection conducted by Luke Taylor (Senior Officer - Waste Regulation) of Natural Resources Wales.

The weather at the time of the inspection was wet with light winds and the site was operational.

The officer was accompanied by a site operative throughout.

W1A General Management - Paragraph 2 (6)(b) of Part 3 Schedule 9 of The Environmental Permitting Regulations 2016 - Category 3

You have been scored for the above breach as there is still no Technically Competent Management provision (TCM) at site, your qualification having expired in August 2024. This was highlighted on the previous compliance assessment report (CAR_NRW0048793 refers) in July 2025.

Following the issuing of the above report, you contacted NRW to state that you had registered with CIWM with a view to obtaining the relevant qualification. You have further stated that you are due to complete the relevant training and obtain the qualification in ten weeks.

A deadline has been issued to accommodate this time frame, however, you must obtain the relevant continued competency qualification by the date below or arrange for the service of a suitably qualified person to act as the TCM for the site.

ACTION - Obtain the relevant qualification or arrange for the services of a suitably qualified person to act as the site TCM. Deadline 31/07/2026

W2C Operating Techniques - Permit Condition 3.1.2 - ACTION ONLY

Your permit states under the above condition, within Table 3.1 Site Containment and

drainage standards, paragraph d) Covered buildings or roofed areas 'Where wastes are stored in a building: i) the building, which shall be include areas on the site plan referenced IT.1, shall be designed, constructed and maintained to prevent the ingress of rain and surface water'.

During the inspection the rear of the de-pollution building roof was seen to be leaking slightly. Within this area there are waste batteries being stored, among other wastes.

ACTION - Inspect and repair the building roof. Deadline 31/05/2026

W4B Reporting - Permit Condition 6.1.1 - Category 3

A review of the waste returns submissions was conducted which highlighted that no returns have been submitted for Q1 and Q4 of 2023 and Q3 and Q4 of 2024. The most recent returns template was sent out to you in December 2025, confirmed by the waste returns team.

The above permit breach was highlighted on the previous Compliance Assessment Report, as above. Following the issuing of that report, you contacted NRW stating that you had provided the returns for Q1 and Q2 of 2024 in August 2025. The waste returns team have reviewed our records, with all correspondence being retained, and no record of this submission can be found.

ACTION - Submit all outstanding waste returns to NRW as required. Deadline 31/05/2026

If you wish to discuss any aspect of this Compliance Assessment Report, please contact me:

luke.taylor@cyfoethnaturiolcymru.gov.uk

Regards,
Luke Taylor

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.