

## Compliance Assessment Report CAR\_NRW0051631

**Permit being assessed:** DB3192CY.

**For:** Monometals Ltd, **held by:** Monometals Limited

**At:** 27-30 Mill Parade, Newport, Newport, NP20 2JQ.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 23/04/2026 between 12:00 and 12:30.

**Parts of permit assessed:** Various.

**NRW Lead Officer:** Anna Andrews, accompanied by Carla Curtis.

**Report sent to:** Martyn Phillips, TCM, on 01/05/2026.

### 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)	
W2D - Waste - Operations - The site	Assessed (A)	
W2F - Waste - Operations - Technical requirements	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3G - Waste - Emissions and monitoring - Fire	Assessed (A)	
W4A - Waste - Information - Records	Assessed (A)	
W4B - Waste - Information - Reporting	C4 No impact	4.2.2

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

Total non-compliances recorded	Total non-compliance score
1	0.1

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
W4B	Please provide annual waste returns for 2024 and 2025, a waste return must still be submitted even if it is a null return. Please provide quarterly hazardous waste consignment notes from March 2024, a hazardous waste consignment must still be submitted even if it is a null return.	01/06/2026

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.**

**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 report details the site visit made on the 23<sup>rd</sup> April 2026 to Mono Metals Limited for an unannounced routine site visit. Natural Resources Wales (NRW) officers Anna ANDREWS and Carla CURTIS arrived at 26-27 Mill Parade, Newport, NP20 2JQ at 12:00 pm and met with site manager Martyn PHILLIPS. Weather conditions were sunny and still at the time of inspection.

### **Permit Breaches**

#### **WB4 – Reporting (Category 4 Breach) –**

Condition 4.2.2 of your permit states: *“Within one month of the end of each year, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it the previous year”.*

**Action: Please provide annual waste returns for 2024 and 2025, a waste return must still be submitted even if it is a null return.**

In addition to waste returns, this site produces hazardous waste from end-of-life vehicle (ELV) treatment operations. Due to this hazardous waste consignment notes are required for each quarter, for any hazardous waste that has been received, removed or disposed at a site. They are a compulsory requirement of the Hazardous Waste Regulations 2005.

**Action: Please provide quarterly hazardous waste consignment notes from March 2024, a hazardous waste consignment must still be submitted even if it is a null return.**

### Site Inspection Observations

Mr PHILLIPS gave NRW officers a tour of the ELV depollution facility whilst the site was in operation. The site was clean and no excessive dust, noise, or odour was witnessed. The hardstanding was in good condition both outside and inside the buildings and there were no signs of oil residue.

Officers were shown the metal waste treatment area inside where metal was reclaimed by manual sorting and/or separation and then stored in separate containers (see Image 1). It was noted that the operator retains any wire that is suitable for re-use in accordance with the waste hierarchy set out in Article 4 of the Waste Framework Directive.



Image 1: Scrap metal before and after treatment.

The ELV depollution bay inside was in good working order (see image 2), with three vehicles awaiting depollution. Fluids removed from vehicles were stored separately in labelled containers (see image 3) ready for disposal, and batteries were stored in battery containers inside their own designated shipping container at the rear of the site.



Image 2: ELV depollution bay



Image 3: Segregated ELV fluids in labelled containers.

Once depollution was completed the vehicles were cubed ready for disposal, no fluids were noted near the cubes indicating they had been properly depolluted. Adjacent to the ELV depollution bay there was a signed posted spill kit station and a large water container for firefighting as well as several extinguishers, Mr PHILLIPS confirmed that the firefighting equipment was checked annually in accordance with the Fire Prevention and Mitigation Plan (FPMP).

The external area of the site consisted of several segregation bays containing different types of metal waste that had been sorted awaiting collection (see image 4). The quarantine area for burnt waste was empty except for a mobile excavator which could be easily moved in the event of a fire. The absence of waste in the area indicated that it's not being used for routine waste storage or processing and is being managed in accordance with the sites FPMP. During the site inspection officers observed a lorry being weighed on the weighbridge prior to being loaded with scrap metal, this process is used to determine the amount of material entering or leaving site and to ensure accurate record keeping for waste transfer documentation.



Image 4: Segregation bays being emptied during collection to the left, cubed cars ready for storage to the right.

Site security was discussed with Mr PHILLIPS, who informed NRW officers that the site operates 24/7 security and is enclosed by secure fencing, which appeared to be in good condition at the time of the inspection. NRW officers Anna ANDREWS and Carla CURTIS left site at 12:30 pm.

**WAMITAB**

Officers discussed the requirement of a WAMITAB certificate with Mr PHILLIPS, who then presented officers with his WAMITAB dating back to 22<sup>nd</sup> April 2025. In future once you have obtained your WAMITAB certificate please email a scanned copy to NRW for our records.

**Waste Returns**

As detailed in the permit breaches section, during the site inspection officers reminded Mr PHILLIPS that annual waste returns need to be submitted annually (see below for details). **Please provide annual waste returns for 2024 and 2025**, a waste return must still be submitted even if it is a null return. Further information can be found at: [Natural Resources Wales / Submit your waste return](https://www.naturalresourceswales.gov.uk/submit-your-waste-return).

**Annual returns**

Annual return period	Deadline for return
January 1 to December 31	January 31 of the following year

The site also produces hazardous waste from the ELV treatment operations, because of this hazardous waste consignment notes are required for each quarter (see below for details) for any

hazardous waste that has been received, removed or disposed at a site. **Please provide quarterly hazardous waste consignment notes from March 2024.** They are a compulsory requirement of the Hazardous Waste Regulations 2005, a hazardous waste consignment must still be submitted even if it is a null return. Further information can be found at: [Natural Resources Wales / How to complete a hazardous waste consignment note.](#)

### Quarterly returns

Quarters	Deadline for return
January 1 to March 31	April 30
April 1 to June 30	July 31
July 1 to September 30	October 31
October 1 to December 31	January 31

### Contact Details

If you have any queries regarding this compliance assessment report (CAR) please contact Dr Anna Andrews at [anna.andrews@cyfoethnaturiolcymru.gov.uk](mailto:anna.andrews@cyfoethnaturiolcymru.gov.uk).

***In this document 'Natural Resources Wales' means the Natural Resource 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](mailto: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](mailto: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.