

## Compliance Assessment Report CAR\_NRW0051689

**Permit being assessed:** UP3495FT.

**For:** Fred Lloyd & Sons Ltd, **held by:** Fred Lloyd & Sons Ltd

**At:** New Inn, Pontypool, Gwent, NP4 0TW.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 22/04/2026 between 10:50 and 11:20.

**Parts of permit assessed:** Various.

**NRW Lead Officer:** Nicola Rossiter, accompanied by Cerys Phillips, Megan Jones.

**Report sent to:** Oliver Hazel, TCM, on 06/05/2026.

### 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	Action only (X)	
W1C - Waste - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2F - Waste - Operations - Technical requirements	Assessed (A)	
W4B - Waste - Information - Reporting	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?

Criteria	Action needed	Complete by
W1A	Submit updated EMS to NRW including updated stockpile details regarding stockpile heights and widths.	31/07/2026

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.

**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

Natural Resources Wales (NRW) Waste Regulation Officer Nicola Rossiter

### PERMIT INSPECTION

On 22<sup>nd</sup> April 2026 NRW Officers Nicola ROSSITER, Cerys PHILLIPS and Megan JONES attended the facility at 10:50 am for an unannounced routine site visit to Fred Lloyd UP3495FT-Scrap Metal. The weather was clear and dry. The Site Supervisor accompanied officers around the site.

### PREVIOUS INSPECTIONS

Compliance Assessment Report (CAR) NRW0043996, issued following the site inspection dated 10/04/24, identified an unresolved action from CAR NRW0041984 following a site inspection dated 13/06/23, which required the operator to;

*“Review and update the sites EMS to include further details regarding stockpile heights / widths to assist in the prevention and / or mitigation of any potential fires. Once reviewed and updated, send to NRW regulating officer for review.”*

During the most recent inspection, officers requested an update on the EMS, the Site Supervisor stated that the EMS was still being worked on and he would chase up completion.

**Action** – Ensure completed EMS is sent to NRW.

### GENERAL OBSERVATIONS

The Site Supervisor highlighted several newly installed items of plant, including a car-breaking machine, see Photograph 1. These machines are being used to improve site processes and operational efficiency, demonstrating the site's commitment to continuous improvement.



Photograph 1. New site equipment, car breaker.

During the site inspection, NRW officers noted that the stockpile height of metal waste, including vehicle shells, located in the outside yard to the North of the site were stacked in potentially unstable positions, as shown in Photographs 2 and 3. The Site Supervisor confirmed vehicle shells would not normally be stored on top of waste metal stockpiles, and that this was a temporary measure as waste was being moved around on site.

Although no specific stacking height limit is defined within the permit, the current method of storage gives rise to an increased risk of vehicle collapse and vehicle movement, which in turn could exacerbate fire risk and hinder effective fire-fighting access.

The operator is reminded that combustible wastes must be stored in a safe and controlled manner, with due regard to fire prevention and site safety, and that storage arrangements should not increase site risk beyond that considered in the approved working plan.

It is expected that the operator reviews and amends the storage arrangement of ELVs to ensure stacks are stable, safely managed, and capable of being accessed and mitigated in the event of an incident.



Photographs 2 & 3. Stockpile of metal waste.

The depolluting area was on an impermeable surface as required by the permit and undercover. The area was well maintained and at the time of the inspection NRW officers witnessed sawdust being used to contain and clean up a small spill on the impermeable surface, demonstrating good practise, as shown in Photographs 4 and 5.



Photographs 4 & 5. Sawdust being used to contain a small spill

Tyres that had been removed from vehicles were kept in separate areas to other waste and were

within the limits set out in the permit. As shown in Photographs 6 and 7.



Photographs 6 & 7. Tyres stacked stored separately in a designated area.\_

All activities observed on site were being carried out in accordance with the conditions of the permit, no breaches were identified during the inspection. No offensive odours were detected by any officer while on site. Noise levels observed during the inspection were consistent with those normally associated with the site's authorised operations and did not give rise to any concerns regarding excessive, unreasonable, or offensive noise. Officers ROSSITER, PHILLIPS and JONES left site at 11:20 am.

#### WAMITAB

Technically competent manager is Oliver Hazel and holds a current certificate at the time of the inspection, a copy of which has been sent to NRW since the site inspection.

#### WASTE RETURNS

Checking NRW systems, the last submitted waste return data received from Fred Lloyd was annual for 2025. Waste Returns were up to date and within waste acceptance limits, thank you, please continue to submit them in a timely manner.

#### ACTION

Submit updated EMS to NRW including updated stockpile details regarding stockpile heights and widths.

Deadline: 31/07/2026

#### CONTACT DETAILS

If you have any queries regarding this CAR form or to provide an update on any actions above,

please contact me using the following details: Nicola ROSSITER, Waste Regulation Officer,  
[nicola.rossiter@cyfoethnaturiolcymru.gov.uk](mailto:nicola.rossiter@cyfoethnaturiolcymru.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](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.