

## Compliance Assessment Report CAR\_NRW0051688

**Permit being assessed:** EP3935UC.

**For:** Waunarlwydd Works, **held by:** Swan Alloy Uk Ltd

**At:** Waunarlwydd Works, Westfield Industrial Park, Waunarlwydd, Swansea, SA5 4SF.

**Type of assessment:** Site Inspection,

**Reason:** Incident Response (Incident number 2604695).

**On:** 06/05/2026 between 11:45 and 12:30.

**Parts of permit assessed:** 1. Management.

**NRW Lead Officer:** Kirsty Thomas, accompanied by Rhodri Morgan.

**Report sent to:** Swan Alloy UK Ltd, HSE Manager, on 07/05/2026.

### 1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Action only (X)	
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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
IR1A	ACTION - Provide an update of the pest controllers finding from recent site meeting. If action is taken, please provide details.	14/05/2026
IR1A	ACTION - Swan Alloy to undertake a thorough review and update of their Pest Management Plan (PMP) to ensure robust measures are in place for preventing and minimising the presence of pests. particularly flies. Submit PMP to NRW.	21/05/2026

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.

**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

This Compliance Assessment Report (CAR) details the comments of Natural Resources Wales (NRW) Officers for the site inspection conducted on 06 May 2026 at Swan Alloy, Waurnarlwydd Works, Waunarlwydd, Swansea, SA5 4SF.

NRW Officers attended the site following reports of fly issues within the Waurnarlwydd area where the Swan Alloy site is located.

#### **Site Observations**

The site contained bales of aluminium cans stored within the designated storage areas. These cans (and other aluminium scrap) are used in the site's process for producing reusable aluminium.

Fly activity was observed during the inspection but was not site-wide. Flies were only present on a limited number of can loads.



*Image 1 - flies seen on site*

The fly life cycle typically comprises four stages: egg, larva, pupa and adult. Only adult flies were observed on site during the inspection; therefore, it was not possible to confirm whether the site is the source of the fly activity or a breeding location at this time.

The bales of cans are accepted on site via the operators waste acceptance procedures. The operator explained the site visually inspects the incoming waste deliveries and the bales of aluminium cans are assigned a reference number linking them to the supplier and then stored on site. NRW Officers spoke with staff at the shipping and receiving department regarding waste acceptance. The reference numbers for the bales of cans with fly activity noted were pulled up on the computer system, and acceptance dates checked to confirm how long the particular loads of cans had been stored on site. The loads in question were received towards the end of April and beginning of May 2026. From speaking with staff, it is possible that the bales arriving at site may have already been infested with flies.

As per CAR\_NRW0049738, it was recommended that Swan Alloy should review the sources of incoming waste, particular the aluminium cans and identify any suppliers or producers whose materials are more likely to be contaminated, including contamination with organic residues or the presence of flies. These sources should be assessed and incorporated into the site's waste acceptance procedures to ensure appropriate controls are in place and reduce pest attraction.

The operator must also ensure waste identified to have flies present are used in the site's processing as soon as possible.

During the inspection, the operator explained and showed NRW Officers that they had begun locating the more high risk wastes that may attract flies to areas as far away from nearby receptors as possible. However, some bales with flies were not located in the preferred location.

As the warmer weather approaches, effective fly control is essential to minimise their spread. Warmer temperatures speed up fly development and population growth, increasing the likelihood of fly-related issues.

### **Pest Management (flies)**

Since NRW's visit, the operator has confirmed that they have:

- Reviewed the materials containing the larger fly numbers and these will be processed within 36 hours.
- The shipping and receiving team are going to be provided communication regarding fly spotting – on the job tool box talks and will continue to record on daily inspections.
- Engaged with their pest controller specialist who will attending site for a meeting on the 8th May 2026.

**ACTION - Provide an update of the pest controllers finding from recent site meeting. If action is taken, please provide details.**

A Pest Management Plan (PMP) was shared with NRW in late 2025 following fly issues seen at that time. The PMP details a risk assessment which includes control measures to help reduce pests such as flies. As per the PMP, for incoming waste displaying signs of infestations, immediate escalation to the HSE manager is required who will then notify

external pest control provider as applicable. Such measures as described in the PMP must be followed.

NRW's comments on the PMP and recommendations are detailed in the report CAR\_NRW0049879.

Recommendations for further improvement (to be considered as part of the next PMP review, or earlier if required) included:  
additional site-specific information on:

- Pre-acceptance checks and waste rejection procedures.
- Maximum storage duration for waste and ensure storage follows a first-in, first-out approach.
- Define acceptable fly counts, establish trigger levels for intervention, and include checks for breeding signs.
- Chemical control options.
- Incident response procedures for handling complaints.
- Review effectiveness of fly control measures and PMP review frequency.

The PMP should be reviewed regularly and updated in response to site changes, pest trends, or evidence of ineffective control measures. Given the recently seen on site flies and upcoming weather, a review of the PMP is required.

**ACTION - Swan Alloy are to undertake a thorough review and update of their Pest Management Plan (PMP) to ensure robust measures are in place for preventing and minimising the presence of pests, particularly flies. Submit PMP to NRW.**

No fly infestations were seen offsite, the flies appear to be localised to a selection of baled can loads on site only.

**END**

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 Industry compliance criteria (used in section 1 and 2):****1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

**2. Operations**

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

**3. Emission and Monitoring**

- IR3A(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

**4. Information**

- IR4A – Records
- IR4B – Reporting
- IR4C – 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.