

Compliance Assessment Report CAR_NRW0051598

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: Audit,

Reason: Routine.

On: 20/04/2026 between 10:00 and 16:30.

Parts of permit assessed: 1. Management, 2. Operations, 3. Emissions and monitoring.

NRW Lead Officer: Kirsty Thomas, accompanied by Liane Bacon-Weekes.

Report sent to: Swan Alloy UK Limited, HSE Manager, on 13/05/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR1A - Installations - Management - General Management	Action only (X)	

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
IR2C	Action REF CAR_NRW0051598.1 - Confirm whether the waste received for the waste consignment note ARCONI/00038 is dross (10 03 09)* or skimmings (10 03 15)*. Please ensure that both the description and the LoW code are consistent and accurate across consignment notes and quarterly hazardous waste returns.	27/05/2026
IR2C	Action REF CAR_NRW0051598.2 - Please advise on whether consignment note ARCONI/0087 is for dross 10 03 09* or skimmings 10 03 15*.	27/05/2026
IR2C	Action REF CAR_NRW0051598.3 - Under the Hazardous Waste (Wales) Regulations 2005, you are required to accept hazardous waste only where it is accompanied by a correctly completed consignment note. Please ensure that you verify with your suppliers that the waste has been accurately described and classified, and that all relevant hazard codes are fully and correctly recorded on the consignment note.	27/05/2026
IR2C	Action REF CAR_NRW0051598.4 - provide further information on the Bridgnorth Aluminium Ltd skimmings waste stream, including the process that produces it.	27/05/2026

Criteria	Action needed	Complete by
IR2C	Action REF CAR_NRW0051598.5 - Please bring to the attention of Hydro that waste carrier details on the duty of care documentation is incorrect.	27/05/2026
IR2C	Action REF CAR_NRW0051598.6 - Provide further details on the origin and production process of the skimmings waste stream being received from Egan Waste Ltd.	27/05/2026
IR2C	Action REF CAR_NRW0051598.7 - Clarify whether the material received from Ashvin Metals Ltd is dross or skimmings and provide further details on the origin and production process.	27/05/2026
IR2C	Action REF CAR_NRW0051598.8 - Please can you provide the information you have demonstrating the non-hazardous classification for each of your suppliers (10 03 16 Skimmings).	27/05/2026
IR2C	Action REF CAR_NRW0051598.9 - Please ensure that all waste received on site is accompanied by accurately completed Duty of Care documentation. Further guidance on completing Waste Transfer Notes is available on our website. Natural Resources Wales / Completing waste transfer notes. Please send a copy of a waste transfer note for the metallics accepted on site.	27/05/2026
IR3A(1)	Action REF CAR_NRW0051598.10 -The Operator is required to confirm whether an oil-water interceptor was previously installed on site and, if so, when it was removed. The Operator should also clearly describe the current mitigation measures in place to protect surface waters prior to discharge.	27/05/2026
IR2C	Action REF CAR_NRW0051598.11 - Provide a copy of the duty of care documentation for the export of waste stream 16 10 02.	27/05/2026
IR2C	Action REF CAR_NRW0051598.12 - Please ensure you obtain confirmation of received from your hauliers for Hills Waste Solution, 10 03 20 -flu gas dust waste stream.	27/05/2026
IR2C	Action REF CAR_NRW0051598.13 - Provide a copy of the duty of care documentation for the export of 16 11 04 other linings and refractories from metallurgical processes.	27/05/2026
IR2C	Action REF CAR_NRW0051598.14 - Please forward a copy of this consignment note CDZ837/27225 once located.	27/05/2026
IR1A	Action REF CAR_NRW0051598.15 - Provide a summary of staff training packages to be delivered.	27/05/2026

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) documents Natural Resources Wales's (NRW) assessment and findings following a detailed waste audit undertaken at Swan Alloy's Waunarlyydd Works in Swansea.

The Waunarlyydd Works operation is designed to recover aluminium from secondary sources, including scrap materials, dross and used beverage cans (UBC).

Aluminium-based waste is received on site and processed in oxy-fuel furnaces to produce molten aluminium for casting.

This activity is permitted under the environmental permit EPR/EP3935UC as a part 2.2 A1(b)i (as per the Environmental Permitting (England and Wales) Regulations 2016 (as amended)) – *melting, including making alloys, of non-ferrous metals, including recovered products and the operation of non-ferrous metal foundries where the plant has a melting capacity of more than 4 tonnes per day for lead or cadmium or 20 tonnes per day for all other metals.*

The audit aim was to assess the site's management and handling of waste in line with permit requirements and waste duty of care. The audit also provided an opportunity to identify any weaknesses and areas for improvement.

Prior to the audit, NRW had requested information via a Regulation 61(1) Notice (issued 04/07/2025). The notice requested particular waste information for waste accepted/received, waste exported, waste flow diagrams, clarification queries and waste classification information. Some information was provided prior to the audit with additional information and queries addressed during and after the waste audit.

The audit involved detailed discussions with the operator, document reviews and on-site inspections. The following key areas were assessed during the audit:

- Waste accepted/received;
- Waste processing/treatment;
- Waste storage and transfer;
- Waste export & waste classification and ;
- Operator technical competency/training

The relevant personnel from Swan Alloy were available and present during the audit. A summary of the audit findings are present in this report.

Waste accepted/received

Wastes arrive to the site via lorries, with all loads processed over a weighbridge on arrival. A range of aluminium-based wastes and materials are accepted in accordance with the permitted waste types listed in the environmental permit, for recovery activities. The Operator explained the site's waste acceptance procedures and provided an overview of

the waste pre-acceptance checks in place.

Pre-acceptance and on-site checks, including visual inspection of incoming loads, are undertaken prior to acceptance. Additionally, sampling of incoming waste is frequently undertaken to verify waste composition and quality (particularly for new suppliers of previously identified poor suppliers). Wastes to be sampled are tested using the smaller furnace present and analysed in the onsite laboratory. A load to be sampled was seen to be taking place during the time of the audit.

Once the sample waste load is melted down, it is cast into a small circular mould and can be analysed in the lab. Each test sample is assigned a reference number and stored within the lab for a period of time. Quality checks aim to establish the quality of the waste, in this case, the aluminium content and how much can be recovered.

Incoming waste movements are recorded on a tracking spreadsheet and subsequently uploaded into the sites computer system, Sage. Unique reference and tracking numbers are assigned to each load, allowing wastes to be traced back to the original supplier.

Supplier assessments are completed for new suppliers and are reviewed annually for existing suppliers. NRW recommended that Swan Alloy strengthen their waste duty of care checks by expanding the supplier questionnaire to include confirmation that suppliers are permitted facilities and to capture relevant permit details where applicable.

Records reviewed during the audit confirmed that non-conforming wastes are identified and managed in accordance with site procedures and permit. Non-conforming wastes may still be utilised in the recovery process, however if waste is of unsuitable quality, it is returned to the supplier. The Operator provided records of where such incidents have taken place recently.

Wastes arrive at site from a variety of suppliers in the UK e.g Local Authorities in England, Wales and Scotland. Waste is also received from non-UK destinations in accordance with Transfrontier Shipment (TFS) controls.

NRW Officers requested a selection of Waste Transfer Notes (WTNs) and Hazardous Waste Consignment Notes (HWCNs) for incoming wastes. Following a review of this information the following observations have been made:

10 03 09 – Black drosses from secondary production:

waste consignment notes:

- ARCONI/00038 – (Received as item 1 in email dated 04/05/26) - It has been noted that the List of Waste (LoW) code 10 03 09* reported in the Q1 2025 hazardous waste quarterly returns differs from the code recorded on the corresponding hazardous waste consignment notes (10 03 15*). The waste is described as “*aluminium dross*”; however, the code applied on the consignment documentation corresponds to “*skimmings*”. Facilities receiving waste have a legal obligation under the Duty of Care (Environmental Protection Act 1990, Section 34) to ensure that any waste accepted is described accurately and sufficiently. There is also a legal requirement to submit quarterly returns to the Regulator that are complete and

accurate, to support the effective tracking of hazardous waste movements.

Action REF CAR_NRW0051598.1 - Confirm whether the waste received for waste consignment note ARCONI/00038 is *dross (10 03 09) or *skimmings (10 03 15)**. Please ensure that both the description and the LoW code are consistent and accurate across consignment notes and quarterly hazardous waste returns.**

- NOVELI/05610 – Awaiting copy.

10 03 15* – Skimmings (hazardous)

waste consignment note:

- ARCONI/00087 – (Received as item 2 in email dated 04/05/26) - The consignment note has been completed correctly, with all required fields present. However, the waste description is recorded as “*aluminium dross*”, while the associated LoW code (10 03 15*) corresponds to *skimmings*, indicating a discrepancy between the description and the classification.

Action REF CAR_NRW0051598.2 - Please advise on whether consignment note ARCONI/0087 is for *dross 10 03 09 or *skimmings 10 03 15**.**

- Four consignment notes from Alvanco Aluminium were provided (in email dated 04/05/26) titled *Dross 19 Feb 2025*, *Dross 21 May 2025*, *Dross 16 Jul 2025* and *Dross 19 Nov 2025*. A review of these consignment notes again note the difference between the waste description and code. We also note that the Part E's have not been completed.

Action REF CAR_NRW0051598.3 - Under the Hazardous Waste (Wales) Regulations 2005, you are required to accept hazardous waste only where it is accompanied by a correctly completed consignment note.

Please ensure that you verify with your suppliers that the waste has been accurately described and classified, and that all relevant hazard codes are fully and correctly recorded on the consignment note. Additional information on completing consignment notes is available on our website [Natural Resources Wales / How to complete a hazardous waste consignment note](#)

As mentioned during the audit and in the subsequent email, a review of the waste data held by NRW identified a discrepancy between the volumes of hazardous skimmings reported in the EPR returns and those recorded in the Hazardous Waste Consignee Returns. We requested you investigate this discrepancy and provide an update on your findings.

A response was provided (Received as item 6 in email dated 04/05/26) stating there had been an error and they had not been added to the hazardous quarterly returns. Please refer to NRW's reply dated 07/05/2026 with regards to resolving the discrepancy.

10 03 16 – Skimmings (non-hazardous)

Duty of Care documentation was requested for non-hazardous skimmings received from facilities in the following areas:

- **Shropshire** (*received as item 3 in email dated 04/05/26*)
Waste received from Bridgnorth Aluminium Ltd. All required fields have been completed. However, it is unclear how skimmings have been generated in Bridgnorth Aluminium Limited.
Action REF CAR_NRW0051598.4 - provide further information on the Bridgnorth Aluminium Ltd skimmings waste stream, including the process that produces it.
- **Wrexham** (*received as item 4 in email dated 04/05/26*)
Waste received from Hydro Ltd. All required fields have been completed; however, the waste carrier details are incorrect.
Action REF CAR_NRW0051598.5 - Please bring to the attention of Hydro that waste carrier details on the duty of care documentation is incorrect.
- **RCT** (*received as item 5 in email dated 04/05/26*)
Waste received from Egan Waste Ltd - All required fields have been completed; however, additional information is required on this waste stream and the process that has generated it.
Action REF CAR_NRW0051598.6 - Provide further details on the origin and production process of the skimmings waste stream being received from Egan Waste Ltd.
- **Lancashire** (*received in email dated 05/05/26*)
Waste received from Ashvin Metals Ltd - All required fields have been completed. However, further information is required to confirm the correct LoW code has been applied. The waste is described as 'dross', but the LoW code used corresponds to 'skimmings'.
Action REF CAR_NRW0051598.7 - Clarify whether the material received from Ashvin Metals Ltd is dross or skimmings and provide further details on the origin and production process.

As mentioned, LoW 10 03 16 is a mirror non-hazardous code and therefore as part of your pre-acceptance checks you are required to request evidence from the producer that supports the non-hazardous classification.

Action REF CAR_NRW0051598.8 - Please can you provide the information you have demonstrating the non-hazardous classification for each of your suppliers (10 03 16 skimmings).

The EPR quarterly returns show that the majority of non-hazardous skimmings is received from a facility in Greece. We requested you provide an example of the Annex VII documentation and evidence to support the non-hazardous classification.

- **Elvalhacor SA** - (*received as item 11 and i, ii, iii, iv in email dated 04/05/26*)

All required fields of the Annex VII completed and supported with the appropriate pyrophoric and flammable gas tests.

Other wastes

During the audit, it was noted that additional waste streams were being received, including UVC fines, metallics, and Incinerator Bottom Ash (IBA) aluminium. We requested you provide copies of the relevant Duty of Care documentation for each of these waste streams.

- Novelis UK Ltd UVC fines - (*received as item H in email dated 04/05/26*). This waste transfer note has not been completed correctly. The notes lacks the required LoW code and signatures.
- Scanmetals IBA aluminium - (*received as item I in email dated 04/05/26*). The delivery notes confirms this material is received as waste coded 19 12 03 but does not contain all the required details for a duty of care waste transfer note.
- Metallics - (*received as item J in email dated 04/05/26*). The document provided is the Certificates of Analysis from ELAB for the refractory lining dated 20.8.2024 not the waste transfer notes for metallics.

Action REF CAR_NRW0051598.9 - Please ensure that all waste received on site is accompanied by accurately completed Duty of Care documentation. Further guidance on completing Waste Transfer Notes is available on our website. [Natural Resources Wales / Completing waste transfer notes](#). Please send a copy of a waste transfer note for the metallics accepted on site.

Once waste has been through pre-acceptance checks and is accepted onto site, waste is stored prior to use in the recovery process.

Waste storage and transfer

During the site walkover, it was clear to see that waste is stored within the site boundary on hard standing. Wastes are stored outside and within dedicated storage buildings. Housekeeping was considered generally good and no odour was detected. Wastes on site was stored in secure areas.

The site has several dedicated storage areas for incoming wastes as well as wastes produced from the recovery activities ie salt slag/salt cake also referred to as 'mud'.

Incoming wastes are stored on site, primarily within the UBC/scrap materials storage areas, dross and product storage buildings. A detailed site plan was provided by the Operator showing waste storage locations as well as site processing activities.

Bales of UBCs were seen on site, some were a better quality than others e.g black bag recovered UBCs were generally in a poorer condition. It is recommended that 'dirtier' waste such as these are located in an area furthest away from nearby receptors. Such waste may attract pests such as flies and therefore location consideration and pest management is important. The site has recently updated its Pest Management Plan (PMP) following the increased number of flies present on site in late 2025 (further updates and control measures are being implemented as of May 2026). The Operator must ensure the PMP is

implemented and reviewed on a regular basis. A minimal amount of flies were seen during the visit.

Dedicated, segregated waste bays were seen within the storage areas, particularly with the dross storage buildings which had assigned bay numbers. These bay numbers form part of the sites tracking system.

Additional schematics were also provided with detailed descriptions of waste generated on site and the storage arrangements.

The main wastes produced on site include salt slag, and bag house dust. These are both a result of the furnace activities. Bag house dust is collected directly from the sites air abatement system in large bags. Bag house dust is stored outside in closed bags, in close proximity to the furnace operations and removed from site on an ad-hoc basis.

Salt slags generated by the furnaces salt slag is initially stored in the mudroom to cool, prior to being transported to the large dedicated salt slag storage area (covered building). It is important that salt slag remains dry as it can react with water to produce a gas. The site is permitted to store 25,000 tonnes of salt slag. Storage volumes are tracked using weighbridge information. The Operator must ensure they remain compliant with these storage limit quantities.

Some waste is produced by the maintenance workshop ie, oily rags, waste oils and batteries. A dedicated maintenance waste area was seen on site. Liquid oil wastes are collected in bunded containers prior to collection and removal offsite.

A vehicle wash bay on site generates effluent and is collected by a third party by tanker.

As well as ensuring waste accepted and stored on site is classified correctly by the supplier and checked by the Operator, waste classification for wastes to be exported from site must be assessed. Waste classification of the above waste streams is detailed in the waste export & waste classification section of this report.

Site drainage - The site, including the waste storage areas appear to be situated on concrete/impermeable hard standing which appeared visually in good condition. The site is permitted to discharge site surface water via emission point WA1 after an 'interceptor' and ultimately drains to the Gors Fawr Brook. Surface water drains/surface water runoff is directed to the v-ditch (which contains recently replaced filter media) to the 'interceptor'. It was clarified on site that this is not an oil interceptor but rather a sump where surface water collects and prior to discharge offsite. The interceptor/sump can be manually closed if required (pollution prevention measure). The site has recently experienced several permit exceedances for several parameters for emissions to water (these non-compliances have been captured in previous compliance reports). Further root cause investigation work and corrective actions are pending and will be subject to further review and assessment by NRW in due course.

It is important the site reviews and implements appropriate corrective actions promptly to ensure this re-occurring issue is addressed.

Following a review of historic information previously submitted to NRW, site drainage is described as discharging via an oil-water interceptor prior to discharge to the Gors Fawr

Brook. It is understood that surface water currently flows through a V-ditch containing filter media, and that additional barriers on the yard surface have recently been installed to capture material prior to discharge to the ditch. However, the drainage arrangements described in earlier documentation are not consistent with the infrastructure observed on site during the inspection. NRW would expect appropriate pollution prevention measures to be in place prior to any surface water discharge to the environment.

Action REF CAR_NRW0051598.10 - The Operator is required to confirm whether an oil-water interceptor was previously installed on site and, if so, when it was removed. The Operator should also clearly describe the current mitigation measures in place to protect surface waters prior to discharge. *It should be noted that oil-water interceptors are designed to control oil and hydrocarbon pollution and are not intended to provide control of metal contamination.*

Waste processing/treatment

Waste accepted on site is used for the processing of non-ferrous metals by metallurgical means (furnaces 1 and 2). Waste streams are fed into the furnaces either as a individual waste stream or as blended mixtures of waste, as required to achieve the desired final product, namely aluminium ingots. This process is undertaken within the furnace hall which has a dedicated air abatement system.

Only one of the two furnaces was in operation during the audit (second furnace undergoing repair). Processing of waste was observed with emissions from the stack (emission point A4) seen to be visibly clear.

No shredding and baling of waste is currently being taken (activity A2 of Table S1.1 of the permit). The Operator confirmed they have no immediate intention to undertake such activities at present.

The permit was recently varied to include activity A3 - mechanical treatment of salt cake. Such activity was seen to be undertaken on site and the process explained by the Operator. This includes the size reduction of slag export materials. Processing activities were seen to be undertaken within an enclosed building and upon an impermeable surface. The process also involves the physical removal of large unprocessed dross material that can be reused in the furnaces and use of a magnet to remove metals i.e steel ropes around baled UBCs.

Waste export & waste classification

Waste accepted on site is used to produce aluminium ingots for sale to customers. The main waste produced from production activities is salt slag/salt cake, also referred to a 'mud'. Salt slag is exported off site primarily to non-UK destinations under TFS. Classified as 10 03 08* (hazardous waste). A review of recent waste returns confirmed waste is currently being export under this waste code.

As with waste to be accepted to site, NRW Officers requested a selection of Waste Transfer Notes (WTNs) and Hazardous Waste Consignment Notes (HWCNs) for exported wastes.

Exported Waste

The EPR waste returns detail the waste exported from site during Q3 and Q4 2025. One Duty of Care note for each of the following waste streams was provided:

- 16 10 02 – Aqueous Liquid wastes - *(received as item 13 in email dated 04/05/26)* – The submitted document is sample analysis. No duty of care provided.

Action REF CAR_NRW0051598.11 - Provide a copy of the duty of care documentation for the export of waste stream 16 10 02.

- 20 01 01 – Paper and cardboard – *(received as item E in email dated 04/05/26)* – completed correctly.
- 20 03 01 – Mixed municipal - *(received as item F in email dated 04/05/26)* – completed correctly.
- 10 03 20 – Flu gas dust -*(received as item 12 in email dated 04/05/26)* – Waste transfer note completely correctly but lacking a signature from Hills Waste Solution.
Action REF CAR_NRW0051598.12 - Please ensure you obtain confirmation of received from your hauliers for Hills Waste Solution, 10 03 20 -flu gas dust waste stream.
- 16 11 04 – other linings and refractories from metallurgical processes. - *(received as item J & K in email dated 04/05/26)* - documents relate to Certificates of Analysis 20.8.2024 ELAB & 25.09.2024 CHEMTECH Environmental. No duty of care documentation provided.

Action REF CAR_NRW0051598.13 - Provide a copy of the duty of care documentation for the export of 16 11 04 other linings and refractories from metallurgical processes.

In relation to the wastes listed above, specifically waste codes 16 10 02, 10 03 20, and 16 11 04, please refer to the email dated 25th February 2026 requesting further information on these wastes.

Our records show one hazardous waste consignment to Biffa Waste Services Ltd during Q1 2025. The consignment note reference for this movement is **CDZ837/27225** and included the movement of 15 02 02* (contaminated absorbents, filter materials etc), 16 01 07* (oil filters) and 16 05 04* (gases in pressurised containers).

Action REF CAR_NRW0051598.14 - Please forward a copy of this consignment note CDZ837/27225 once located.

The Operator should continue to assess waste classification as per *Technical Guidance WM3 - Guidance on the classification and assessment of waste*.

Operator Competency/Training

The Operator has been progressing with obtaining qualifications under an approved competency scheme (action set under previous compliance reports) as required by condition 1.1.4 of the permit. The Operator has completed and passed several units under

CIWM Level 4 Waste and Resource Management consisting and mandatory and optional modules. The Operator is also in the process of completing CIWM Level 4 High Risk Operator Competence for Managing Physical and Chemical Treatment of Hazardous Waste.

As an interim measures, the Operator has an Technical Competent Manager (TCM) fulfilling and supporting with waste related aspect of site operations whilst the Operator completes their own technical competency qualifications. CoTC of the interim TCM has been provided to NRW and are suitable.

The Operator must manage and operate activities using sufficient competent persons. All staff members on site should have an awareness of their waste responsibilities and waste duty of care. This was identified as an area to improve on. The Operator explained that a refreshers training will be provided - training package to be delivered (to form part of induction for new starters and ongoing competency checks for existing staff).

Action REF CAR_NRW0051598.15 - Provide a summary of staff training packages to be delivered

Summary

Overall, the Operator demonstrated a good knowledge of their waste duty of care responsibilities and compliance with Conditions 2.3.2, 2.3.4, 2.3.6 and is progressing with actions to meet compliance of condition 1.1.4.

Following the completion of this waste audit and the previously submitted information as requested by the Regulation 61(1) Notice (issued 04/07/2025), NRW considers the Operator to have satisfied the requests of the Regulation 61(1) Notice. However, additional information regarding the Operators waste duty of care is requested as per this compliance report.

Previous CAR Actions

Action	Details	Status
Previous CAR Form actions - CAR_NRW0049879		
1	Action Ref - CAR_NRW0049879.1 - The Operators is to provide Q3 2025 waste returns as required by Condition 4.2.5 of the environmental period EPR/EP39395UC.	Complete
2	Action Ref - CAR_NRW0049879.2- Provide Certificates of Technical Competence (CoTC) (for the operator) of an appropriate and approved competence scheme as required by condition 1.1.4.	Due 31/08/2026 - in progress
Previous CAR Form actions - CAR_NRW0050552		

1	Action Ref - CAR_NRW0050552.1 - Swan Alloy to provide a summary of the root cause investigation conclusions and further actions agreed to prevent recurrence of the oil and grease exceedance incident	*Overdue
2	Action Ref - CAR_NRW0050552.2- Swan Alloy to provide a summary of the root cause investigation conclusions and further actions agreed to prevent recurrence of the aluminium exceedance incident. Additionally, Swan Alloy are to provide results for the second sample taken and confirm return to compliance with the permit limit for aluminium.	Complete
3	Action Ref - CAR_NRW0050552.3 -The Operators is to provide Q4 2025 waste returns as required by Condition 4.2.5 of the environmental period EPR/EP39395UC.	Complete
4	As per previous CAR - Action Ref CAR_NRW0049879.1- The Operators is to provide Q3 2025 waste returns as required by Condition 4.2.5 of the environmental period EPR/EP39395UC.	Complete
Previous CAR Form actions - CAR_NRW0051688		
1	ACTION - Provide an update of the pest controllers finding from recent site meeting. If action is taken, please provide details.	Complete
2	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.	Due 21/05/2026
<u>END</u>		

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

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.