

Compliance Assessment Report CAR_NRW0052050

Permit being assessed: BB3290CW.

For: D & E Scrap Metals Ltd, **held by:** D&E Scrap Metals Limited

At: Adelaide St, Crindau, Newport, NP20 5NF.

Type of assessment: Site Inspection,

Reason: Routine.

On: 03/06/2026 between 10:10 and 10:50.

Parts of permit assessed: Various.

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

Report sent to: Tania Eagle, TCM, on 09/06/2026.

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	C3 Minor	Section 2.3.1, Table 2.3
W2D - Waste - Operations - The site	Action only (X)	
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W4A - Waste - Information - Records	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
1	4

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
W2C	Please repair the damaged areas of hardstanding and make sure depolluted vehicles and their parts are stored in a suitable location on-site to minimise the risk of fluid leakage onto the site surface.	10/01/2027
W2D	Please provide officer ANDREWS with photographic evidence that the damaged fencing at the rear of the site has been repaired.	10/01/2027

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 3 June 2026 to D & E Scrap Metals Limited for an unannounced routine site inspection. Natural Resources Wales (NRW) officers Anna ANDREWS, Carla CURTIS, and Sarah PERKINS arrived at D & E Scrap Metals Limited, Adelaide Street, Crindau, Newport, NP20 5NF at 10:10 am and met with TCM Mrs Tania EAGLE and were escorted around site with a staff member. Weather conditions were overcast and wet at the time of inspection.

Permit Breaches

W2C Operating techniques (category 3 breach) –

During the site inspection, a significant amount of standing water was observed pooling on the hardstanding due to its uneven and poor condition. Visible oil contamination was present within this standing water. This indicates that the hardstanding is not being maintained to an appropriate standard to ensure effective containment and drainage of liquids. This is not in accordance with section 2.3.1, where table 2.3 states:

"4. Whole undepolluted and undamaged vehicles shall be stored on an impermeable pavement" and;

"8. All wastes shall be treated on an impermeable surface with sealed drainage system".

Where "impermeable surface" means a surface or pavement constructed and maintained to a

standard sufficient to prevent the transmission of liquids beyond the pavement surface.

ACTION: Please repair the damaged areas of hardstanding and make sure depolluted vehicles and their parts are stored in a suitable location on-site to minimise the risk of fluid leakage onto the site surface by the 10 January 2027.

W2D The site (Action only) –

ACTION: Please provide officer ANDREWS with photographic evidence that the damaged fencing at the rear of the site has been repaired by the 10 January 2027.

Site Inspection Observations

At the beginning of the site inspection, officers requested the most recent WAMITAB, Environmental Management System (EMS), and Fire Prevention and Mitigation Plan (FPMP) documents. Mrs EAGLE provided both physical and electronic copies of each document and advised that the EMS was due to be reviewed. When the EMS is reviewed, please ensure that your EMS reflects the activities undertaken on site to minimise any risks to the environment or human health. All operational activities should be systematically assessed to identify potential risks. Appropriate control measures and procedures must then be implemented and fully documented to demonstrate how these risks are effectively managed. The EMS must ensure that all site activities are carried out in compliance with the conditions of the environmental permit and all relevant legislation.

The site benefits from S1, S2, and T9 waste exemptions. During the visit, officers reminded Mrs EAGLE that waste exemptions are currently being reformed, and it is anticipated that these changes may require D&E Scrap Metals Limited to obtain a bespoke environmental permit for their operation. Further information on these changes can be found here: [Reforming the waste exemptions system - GOV.UK](https://www.gov.uk/reforming-the-waste-exemptions-system)

At the time of inspection, the site entrance was observed to be clean and free from residues. There was no evidence of excessive dust, noise, or odour, and no litter was observed leaving the site. A clearly signposted fire station was located at the entrance, equipped with sand, fire hoses, and portable firefighting equipment (see image 1). Several areas of the site were observed with waste deposited outside of skips and across the hardstanding, likely resulting from sorting activities. Please ensure that good housekeeping is maintained, including regular litter picking, to prevent the accumulation of waste outside designated storage areas.



Image 1: Firefighting station located at the site entrance.

All treatment and sorting activities were undertaken indoors. Metal waste was weighed prior to being placed into the unsorted metal waste stockpile located at the top of the site. The metal waste is then treated and segregated before being stored in a labelled skip or segregation bay awaiting collection. A designated skip was also in place for unauthorised items too.

End-of-Life Vehicle (ELV) depollution activities are carried out in a separate building, where vehicles are stored outside awaiting treatment. ELV components (e.g. batteries, alternators and rims etc.) were stored externally in labelled containers (see images 2 and 3). Tyres were stored appropriately within a dedicated bay, segregated from other waste types using concrete blocks. Several batteries were observed stored on the ground at the entrance to the ELV depollution bay. A staff member advised that these would be placed in a new battery container by the end of the day to prevent exposure to rainfall. Please ensure that batteries are stored appropriately to prevent exposure to rainfall.



Images 2 and 3: Left – Battery container with lid. Right – Labelled skip for stored scrap metal.

Liquids from ELV depollution activities were stored in clearly labelled containers (see image 4). While dedicated secondary containment is not in place, the depollution bay is under cover on an impermeable surface with a raised edge, and the wider site benefits from sealed drainage with an interceptor. On this basis, the current arrangements are considered acceptable, however, **the provision of dedicated secondary containment (e.g. bunding for all liquid containers) is strongly recommended to ensure any leaks or spills are fully contained at source and to align with best practice.**



Image 4: Liquids from ELV depollution activities in labelled containers with no direct secondary containment.

The site is surfaced with hardstanding, which was observed to be uneven and in poor condition in places. Rainfall prior to and during the visit highlighted this issue, with significant areas of standing water across the surface. Although drainage to the sealed sump appeared operational, water was not effectively draining due to the condition of the hardstanding. Visible oil contamination was noted within the standing water (see images 5 and 6), likely originating from nearby undepolluted vehicles and/or components. **Please ensure that the hardstanding is well maintained and depolluted vehicles and their parts are stored in a suitable location on-site to minimise the risk of fluid leakage onto the site surface.** Any oil spills must be contained and cleaned up immediately using appropriate spill kits to prevent the ingress of pollutants into waterways.



Images 5 and 6: Left – Oil next to a non-depolluted engine. Right – Oil in the drainage channel connected to the sealed sump.

Site security consists of perimeter fencing, CCTV, and a locked gate. A hole was identified in the fencing at the rear of the site, which Mrs EAGLE advised is due to be repaired. **Please repair the damaged fencing at the rear of the site.** NRW officers ANDREWS, CURTIS, and PERKINS departed the site at 10:50 am.

WAMITAB

Mrs Tania EAGLE is the TCM, who has a WAMITAB with an expiry date of the 20 November 2026.

Waste Returns

D&E Scrap Metals have no outstanding waste returns. In 2025, 225 tonnes of waste were received and 306 tonnes were removed from site. These figures are within the permitted annual allowance of 5,000 tonnes. It was noted that the waste returns submitted for Q1 2026 and Q4 2025 both record the same amounts for waste received and waste removed within each reporting period. Please ensure that all waste returns accurately reflect the quantities of waste accepted and removed from site.

Contact Details

If you have any queries regarding this Compliance Assessment Report (CAR) please contact Dr Anna Andrews at 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

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.