

Compliance Assessment Report CAR_NRW0052054

Permit being assessed: BB3793ND.

For: Nevills Dock, **held by:** AMG Resources Ltd.

At: A M G Resources Ltd, Nevills Dock, Llanelli, Carmarthenshire, SA15 2HD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 04/06/2026 between 13:00 and 14:00.

Parts of permit assessed: W2D The site, W2C Operating techniques, W3F Pests and W1A General Management.

NRW Lead Officer: David Ellar, accompanied by David Morgan, Alex Underhill.

Report sent to: Adrian Stewart, TCM, on 12/06/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2D - Waste - Operations - The site	C2 Significant	2.4.1
W2C - Waste - Operations - Operating techniques	Ongoing (O)	2.3.1
W3F - Waste - Emissions and monitoring - Pests	Assessed (A)	
W1A - Waste - Management - General management	Assessed (A)	
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
1	31

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
W2D	Ensure that all wastes are removed and stored in accordance with permit condition 2.4.1. and within permit boundary.	31/08/2026
W2C	You must maintain site surfaces to prevent the ponding of surface water	03/07/2026

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

An announced, routine site inspection was undertaken on 04/06/2026 to assess compliance against the Standard Rules (SR2008 No 21: 75kte metal recycling site) - Permit No: EPR/BB3793ND held by AMG Resources limited. Present at the time of the inspection were: David Ellar, David Morgan and Alex Underhill (Natural Resources Wales) and the site General manager (AMG Resources Limited).

The weather was fine but had been wet over the previous few days.

Previous inspection (CAR_NRW0051597):

The site was previously visited on the 16/04/2026 by David Morgan and Alex Underhill (NRW). During this inspection no new permit breaches were identified however two 'ongoing' issues were noted:

- W2A - Permitted Activities – Waste stored outside permit boundary. (now recorded under W2D)
- W2C - Operating techniques - Site infrastructure (site surface) is damaged and is not preventing ingress of potentially contaminated water into unmade ground.

And the following actions were set:

- W2A - Remove waste from outside permitted boundary by 03/07/2026.
- W2C - Maintain site infrastructure (site surfaces) to ensure all waste is stored in line with permit condition 2.3.1 by 03/07/2026.

It was also noted that AMG Resources were not compliant with their Environmental Permit. However, NRW acknowledged the operator's intention to submit an application to vary the permit and requested that this application be submitted by Friday 3 July 2026.

Permit Breaches:

The Site - W2D - Category 2 noncompliance

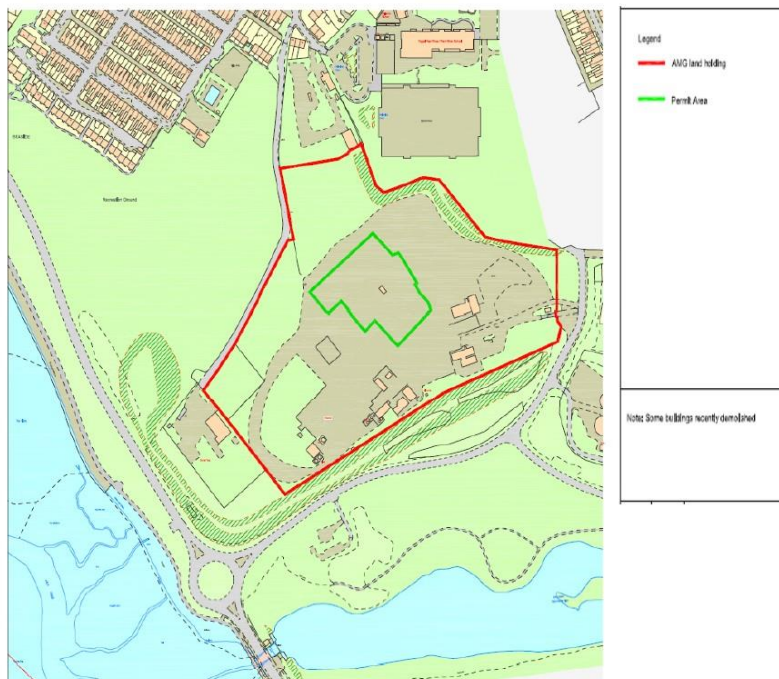
Waste was seen outside the permitted area. **This has been scored as a Category 2 breach of permit condition 2.4.1.**

Section 2.4.1 of permit states:

2.4.1 *The activities shall not extend beyond the site, being the land shown edged in green on the site plan attached to the permit.*

Site plan from permit showing permitted boundary edged in green:

Schedule 1 - Site plan



During the inspection a significant quantity of waste was seen outside the permitted area. There was a large quantity of clean scrap metal which was stored on concrete, this was first observed during an inspection on the 11/07/2025 (CAR_NRW0048947) and was considered to be low risk. Compliance scores were suspended and an action to either remove the waste or vary the permit to extend the permitted area was set. The waste was still in situ and no permit variation application has been made. During this inspection, the 'clean' scrap sheet metal was still on the concrete area but there was also a large quantity of unprocessed waste cans stored outside of the permitted area and on unmade ground. This has a higher potential of causing pollution and increased risk of fly breeding activity.

The operator has previously been made aware of risks associated with waste storage outside of the permitted area but instead of improving operations, more potentially polluting waste has been deposited and the risk of pollution and environmental harm has increased which is why the breach has now been scored as a **category 2 noncompliance**.

Photograph showing unprocessed cans and scrap metal outside of permitted area and on unmade ground:



Action - Ensure that all wastes are removed and stored in accordance with permit condition 2.4.1. and within permitted boundary.

Site Infrastructure - W2C - Recorded as 'O' ongoing.

A previous action to maintain site infrastructure (site surfaces) to ensure all waste by 03/07/2026 was set due to non-compliance against Condition 2.3.1 of the Environmental Permit. Site infrastructure still does not meet the requirements of the Environmental Permit. Site infrastructure (site surface) is damaged and is not preventing ingress of potentially contaminated water to ground. In some areas surface water was seen pooling and has the potential to attract pests, namely flies, in warmer periods when there is a high risk of fly breeding.

The site does not benefit from a sealed drainage system.

Photograph showing pooling of surface water:



Action - You must maintain site surfaces to prevent the pooling of surface water.

Given the significance of the breaches above, NRW will have to consider its enforcement response. You will be written to separately regarding this decision.

General observations:

Pest Management:

An inspection of fly monitoring and capturing methods were reviewed on site. Monitoring boards appeared to be indicating very low numbers being present, capture bags were also showing low numbers of flies. It was noted that regular monitoring was being carried out by a specialist and treatment was undertaken if required. This is inline with the current pest management plan.

Generally, it was deemed that house-keeping on site had improved. Concrete A-Frames appeared to have been cleared recently and there was less litter windblown around the site than previously noted..

Thank you for your time during the inspection.

Ends.

In this document 'Natural Resources Wales' means the Natural Resources 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.