

Compliance Assessment Report CAR_NRW0052253

Permit being assessed: AB3797ZE.

For: KDK Metals Unit, **held by:** KDK Metals Limited

At: K D K Metals, East Bank Road, Felnex Industrial Estate, Newport, Newport, NP19 4PP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 18/06/2026 between 12:00 and 12:35.

Parts of permit assessed: Various.

NRW Lead Officer: Nicola Rossiter, accompanied by Carla Curtis, Sarah Perkins.

Report sent to: Paul Dare, Site Operator, on 02/07/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2E - Waste - Operations - Waste acceptance	C3 Minor	2.3.2
W4B - Waste - Information - Reporting	C4 No impact	4.2.2
W2D - Waste - Operations - The site	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2F - Waste - Operations - Technical requirements	Assessed (A)	
W1A - Waste - Management - General management	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
2	4.1

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
W2E	Ensure that wood is removed from the permitted site and only material authorised by your permit is accepted	31/08/2026
W4B	Ensure waste returns are submitted and up to date and take all steps necessary to respond to waste returns team	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 18th June 2026 NRW Officers Nicola ROSSITER, Carla CURTIS and Sarah PERKINS attended the facility at 12 noon for an announced site visit to KDK Metals AB3797ZE. The inspection was to assess the suitability to partially surrender their environmental permit AB3797ZE. The Site Operator and the Environmental Consultant, who also acts as TCM, accompanied officers around the site. The weather was overcast and dry.

PERMIT BREACH

During the inspection, NRW officers identified a quantity of waste wood being stored within the permitted area of the site, shown in photograph 1. The Site Operator stated that the wood had been accepted under a registered waste exemption.



Photograph 1. Stockpile of waste wood

NRW Officers subsequently identified that the storage of waste wood was not authorised under the environmental permit, and was not covered by a valid exemption, the most recent of which expired on 18/02/25. The storage of this waste therefore constitutes an unauthorised waste operation.

To maintain full compliance with the environmental permit, the operator must only accept, store and treat wastes that are authorised by the permit. As detailed below, the permit authorises the acceptance and storage of end-of-life vehicles and residual wastes arising from the depollution and treatment of those vehicles.

2.3.2 Waste shall only be accepted if:

(a) it is of a type and quantity listed in schedule 2 table(s) S2.1 [, S2.2 etc.]; and

Table S2.1 Permitted waste types and quantities for end of life vehicle de-pollution

Maximum quantity	The maximum quantity for waste to be accepted on site shall not exceed 2,499 tonnes per year.
Exclusions	Notwithstanding the waste types set out in this table, wastes having any of the following characteristics shall not be accepted: hazardous waste
16	WASTES NOT OTHERWISE SPECIFIED ON THE LIST
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 04*	end-of-life vehicles
16 01 06	end-of-life vehicles (containing neither liquids nor other hazardous components)

Therefore, the acceptance and storage of waste wood is a breach of **permit condition 2.3.2**.

W2E Waste acceptance – Category 3 breach

Action – Ensure that wood is removed from the permitted site and only wastes authorised by the environmental permit are accepted, stored and treated on site.

Deadline 31st August 2026.

Waste returns for the site have historically been submitted quarterly and are currently outstanding. As stated within your permit these should be submitted annually and should be received by NRW within one month of the end of each year. Waste returns, **including null returns** where no waste has been processed, must be up to date in order for a surrender to be granted. Since the inspection, NRW Officer Rossiter has been in contact with the waste returns team regarding the submission of these returns. The team have subsequently liaised with the site operator and provided advice and guidance on transitioning to digital submissions.

- 4.2.2 Within one month of the end of each year, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous year.

A breach of **permit condition 4.2.2** has been recorded for the failure to submit waste returns to NRW within the required timescales.

W4B Reporting – Category 4 breach

Action – Ensure waste returns are submitted and up to date and take all steps necessary to respond to waste returns team.

Deadline 31st July 2026.

AREA FOR SURRENDER

At the time of the visit, the Site Operator confirmed that part of the permitted area has been sold to another firm. The Site Operator discussed plans to reduce this permitted area by submitting a partial surrender. There were also discussions with both the Site Operator and the Environmental Consultant regarding a potential variation to the current permit. The operator was advised that the partial surrender and the variation would need to be submitted separately, please see links below for advice and guidance on both a surrender and how to vary a bespoke permit:

[Natural Resources Wales / Apply to surrender \(give up\) all or part of a waste permit](#)

[Natural Resources Wales / Apply to change to, or vary, a bespoke waste permit](#)

During the inspection, Officers spoke with staff of the business operating on the area of permitted land that has been sold by KDK Metals, this appears to have been bought by a motor repair business. The new owners informed NRW Officers of their intentions to undertake vehicle depollution activities in the future. This is a regulated activity which would require the appropriate environmental permit. Officers observed that they had invested in site infrastructure and equipment associated with the proposed activity, as shown in photographs 2 and 3. Officers explained that the existing permit could not be extended or partially transferred to this new business. Should KDK metals wish to remove this area from the existing permit, they would first need to apply to surrender this area of their permit. Should the new owners wish to undertake vehicle depollution activities, they would need to submit a separate environmental permit application to NRW before any regulated activities commence. NRW Officers made it very clear to the new owner that **no regulated waste activities** can take place unless and until the appropriate environmental permit is in place. This was acknowledged by the new owners.

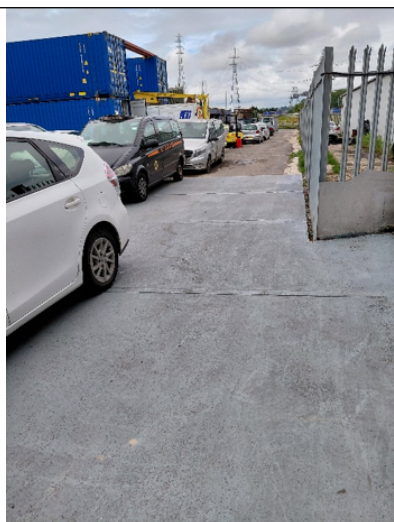


Photograph 2. Newly bought container for depolluting – not currently in use



Photograph 3. Newly bought equipment for depollution of cars – not currently in use

The motor repair business is currently functioning as a repair shop for taxis; there were numerous taxis stored in the area of the permit to be surrendered. NRW officers were assured by the new owners that all vehicles were to be repaired or were in working order and awaiting collection/sale. As shown in photographs 4, 5 and 6.



Photograph 4. Vehicles awaiting repair, collection or sale



Photograph 5. Inside the warehouse, new tyres and vehicles being repaired



Photograph 6. Entrance to the area of the permit that is to be surrendered

There was no evidence of contamination or illegal waste activity in the area proposed for surrendered.

Based on the existing permit, the site inspection and previous and current activities at KDK Metals AB3797ZE, it is likely that a **normal surrender** should be submitted for this site. However, confirmation of this will be provided by the permitting team during the determination period.

All other activities observed on site were being carried out in accordance with the conditions of the permit, and no additional 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, CURTIS and PERKINS left site at 12.35 pm.

WAMITAB

The current TCM is Mark Harvey who holds an up-to-date WAMITAB, thank you for sending through the certificate.

ACTIONS

Submit all outstanding waste returns for site, including null returns. Deadline 31st July 2026.

Ensure that wood is removed from the permitted site and only material authorised by your permit is accepted. Deadline 31st August 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.go.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

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.