

Compliance Assessment Report CAR_NRW0052257

Permit being assessed: BB3394CL.

For: Morris & Co (Handlers) Ltd, **held by:** Morris & Co (Handlers) Ltd

At: Top Shed, Neath Abbey Wharf, Skewen, SA10 6BL.

Type of assessment: Site Inspection,

Reason: Routine.

On: 19/06/2026 between 10:10 and 11:15.

Parts of permit assessed: W1, W2, W3.

NRW Lead Officer: David Morgan, accompanied by Edward Davies.

Report sent to: Martin George, Site Manager, on 03/07/2026.

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)	
W2D - Waste - Operations - The site	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3A(2) - Waste - Emissions and monitoring - Emissions to air	Assessed (A)	
W3G - Waste - Emissions and monitoring - Fire	Assessed (A)	

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?

No action required.

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

A site inspection was undertaken on Friday 19th June 2026. The purpose of the inspection was to assess compliance with Environmental Permit conditions and discuss a recent fire incident that occurred on site (4th June 2026).

Fire Incident

Following a recent fire on site, which occurred on 4th June 2026, waste storage and treatment operations had recommenced.

We discussed the fire incident, the incident response and recovery phase of the incident. The following observations were made:

- A review of the CCTV footage identified the source of ignition as a rogue waste item, potentially a lithium-ion battery or other electrical component.
- At the time of the incident, the site was undertaking works to replace plant and equipment, resulting in lower-than-normal waste volumes being stored on site. Waste storage arrangements, including stack sizes and separation distances, were compliant with the requirements of the Environmental Permit.
- Mid and West Wales Fire and Rescue Service (FRS) confirmed that firewater generated during the incident was successfully contained within the main building. There was no release of potentially polluting firewater to the site's drainage system or lagoon. Contaminated firewater was removed from site and Consignment Notes have been provided to Natural Resources Wales.
- Whilst the building sustained some fire-related damage, this was minor in extent. The structure remains accessible and capable of supporting normal day-to-day operations.
- Based on a review of the CCTV footage and discussions with both the FRS and the Site Manager, it appears that the site was operating in accordance with the requirements of the Fire Prevention and Mitigation Plan at the time of the incident.

- It was agreed that Morris & Co would undertake a further review of the incident and the effectiveness of the response in order to identify any opportunities for improvement and enhance future incident management arrangements.

An inspection of the site was undertaken, during which the following observations were recorded:

W1A, W2A – General Management and Permitted Activities

Following the recent fire incident, it was observed that the site had returned to operating at near full capacity.

At the time of the inspection, all waste present on site was consistent with the list of permitted waste types. All waste was being stored either within the main building or beneath the covered storage bay located in the main yard.

Duty of Care Waste Transfer Notes were provided for the incinerator-derived scrap metal waste.

No evidence was identified to suggest that the fire incident had resulted in any environmental impact beyond the site boundary. Overall, the site appeared to be operating effectively and in a well-managed manner.

Waste storage and treatment activities were observed to be compliant with the requirements of the Environmental Permit.

W2D – The Site

Certain waste streams generated from site activities, specifically steel wire recovered from baled materials together with residual metals and plastics, are currently being stored on the adjacent wharf area, outside the permitted boundary.

This waste is presently being stored under a registered S2 Waste Exemption (Storage of Waste in a Secure Place).

It was noted that Morris & Co intends to submit an application to vary the Environmental Permit in order to incorporate this area within the permitted boundary. Once the permit variation has been approved and implemented, the S2 Waste Exemption must be deregistered.

Please note that the waste exemption cannot be utilised to increase storage capacities or undertake additional activities beyond those authorised by the Environmental Permit.

W3A(2) – Emissions to Air

Prior to and during the inspection, weather conditions had been dry, with little to no rainfall recorded.

No excessive dust accumulations were observed across the site, and dust emissions appeared to be effectively managed. As waste was being stored within enclosed or covered areas, surface water collected on site and discharged to the lagoon via the interceptor showed no visible evidence of contamination from dust.

W3G – Fire Prevention

At the time of the inspection, the site appeared to be operating in accordance with the requirements of the Fire Prevention and Mitigation Plan.

Following the recent fire incident, it was agreed that Morris & Co would undertake a review of the incident to identify any lessons learned and opportunities for improvement that could further enhance fire prevention and response arrangements on site.

Conclusion

No non-compliances were identified during the inspection. The activities assessed were found to be compliant with the relevant permit conditions and regulatory criteria.

END OF REPORT

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.