

Compliance Assessment Report CAR_NRW0052443

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: Incident Response (Incident number 2607135).

On: 14/07/2026 between 09:00 and 17:00.

Parts of permit assessed: W3F.

NRW Lead Officer: Alex Underhill.

Report sent to: Adrian Stewart, TCM, on 05/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3F - Waste - Emissions and monitoring - Pests	C2 Significant	3.1.1

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
W3F	Increase monitoring board inspection from weekly to twice per week. Follow sections of approved PMP to reduce fly activity and prevent breeding cycle, and ensure compliance with PMP and permit conditions.	17/08/2026

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**Purpose of inspection:**

This was an unannounced site inspection conducted by Alex Underhill of Natural Resources Wales (NRW), accompanied by two officers from Carmarthenshire County Council Public Health department.

The inspection was undertaken in response to reports of elevated fly activity in the local area and to assess compliance with the site's Pest Management Plan (PMP) and Environmental Permit EPR-BB3793ND (Standard Rules Permit SR2008No21).

It was noted that weather conditions had been unusually hot in the period leading up to the inspection, which may have increased the potential for fly activity.

Previous inspection:

An outstanding action remains open from CAR Form CAR_NRW0052054, issued on 04/06/2026, requiring the operator to ensure all waste is stored within the permit boundary and managed in accordance with Permit Condition 2.4.1.

This matter is relevant to the current inspection, as the operator confirmed that pesticide treatment is only applied to waste stored within the permit boundary on the concrete pad. Consequently, waste stored outside the permit boundary is not being treated in accordance with Section 8.1.2 of the PMP. The previous inspection was undertaken on 09/07/2026. Although no non-compliances were identified during that visit, elevated fly activity was observed in several isolated waste storage areas. Further details are recorded in CAR Form CAR_NRW0052319.

Permit Breaches:**W3F (Pests) - Category 2 Breach**

A Category 2 permit breach against W3F (Pests) and condition 3.1.1 of the permit was identified during this inspection.

Permit condition 3.1.1 states:

Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

Evidence gathered through ongoing investigations has identified the site as a potential source of significant off-site fly activity. The fly infestation is considered to be having a significant adverse effect on people and property due to the widespread and repeated presence of flies at sensitive receptors.

The infestation is materially affecting the reasonable enjoyment of homes, gardens and workplaces, resulting in a persistent nuisance and loss of amenity. As these impacts extend beyond the operational boundary of the site, they constitute a significant environmental impact.

The evidence obtained to date indicates that site activities are contributing to the infestation and that the pest management measures currently implemented have not been effective in preventing off-site impacts.

Pests (W3F):

Waste Acceptance and Inspection

Section 5.2 of the PMP states that pre-acceptance inspections are undertaken prior to collecting waste shipments and that loads exhibiting high levels of pest activity should not be accepted. Section 5.3 of the PMP states baled cans will be unloaded from the sheeted articulated transport vehicles and the presence of flies and other pests will be evaluated as the bales are unloaded. Bales showing signs of fly infestation or foul odour will be placed into the off-spec holding area whilst management evaluate the best means to address the problem. If a load is infested the load may be rejected or quarantined in the off-spec area. Where the presence of flies are noted but the load is not infested the load may be quarantined prior to insecticide treatment or may be separated and re-baled directly, without putting to stock.

The operator advised that incoming loads are inspected upon arrival and that loads displaying elevated pest activity are quarantined and treated by an external pest control contractor. However, information provided by the local authority may indicate that some deliveries may have been accepted without undergoing the pre-acceptance inspection process outlined in Section 5.3. The operator should ensure that this procedure is consistently implemented in accordance with the approved Environment Management System (EMS) and the PMP.

Stock Management and Rotation

The operator advised that waste is currently processed on a stock rotation basis of approximately one to two weeks to assist with pest control.

Section 5.4 of the PMP sets a target stock turnaround period of less than ten days.

To reduce fly activity, the operator has reduced incoming waste volumes to approximately half of normal operating levels. This has allowed existing waste stocks to be processed and removed, resulting in lower stockpile volumes across the site.

Although stockpiles were significantly reduced compared with historic levels, they remained broadly similar to those observed during the previous inspection. Effective stock rotation should continue to ensure all waste can be adequately treated through the site's pest control measures.

Monitoring Arrangements

The operator has installed 17 fly monitoring boards and approximately 40 fly bags throughout the site.

During the inspection, several monitoring boards were found to be ineffective due to missing adhesive pads or pads that had become detached from the boards. As a result, effective monitoring could not be undertaken in these locations. This is contrary to Section 6.2 of the PMP.

The operator advised that monitoring cards are replaced weekly on Mondays. However, Section 6.2 of the PMP requires monitoring cards to be replaced twice per week during warmer months.

The monitoring regime should therefore be amended to ensure compliance with the approved PMP.

Evidence of Breeding Activity

Several areas of stored waste exhibited very high levels of fly activity.

The presence of both larvae and pupae was confirmed during the inspection. The identification of both life stages provides evidence that fly breeding is occurring on site.

This demonstrates that the current PMP is not preventing breeding activity and should therefore be reviewed and updated to ensure it remains effective.

Effectiveness of Control Measures

The site's external pest control contractor continues to undertake daily spraying activities and provides weekly monitoring reports.

Despite these measures, high levels of fly activity were observed within central waste stockpiles that were reportedly subject to daily pesticide treatment.

This indicates that the current control measures are not fully effective in reducing fly activity across the site. The effectiveness of the PMP should therefore be reviewed to identify and implement additional control measures capable of achieving compliance with permit requirements.

Housekeeping

Section 5.5 of the PMP requires waste storage areas to be visually inspected and cleaned daily.

During the inspection, accumulations of wind-blown litter were observed within the concrete A-frame structures towards the rear of the site.

These accumulations suggest that daily inspections and housekeeping activities have either not been undertaken or have not been sufficiently effective, contrary to the requirements of Section 5.5 of the PMP.

Conclusion

The inspection identified evidence of active fly breeding and elevated fly populations across several waste storage areas. Monitoring arrangements were not fully compliant with the approved PMP, housekeeping in some areas was poor, and the effectiveness of existing pest control measures could not be demonstrated given the level of activity observed on site.

In conjunction with evidence gathered through ongoing investigations regarding off-site impacts, NRW considers that the current PMP is not adequately controlling fly activity and requires review and improvement to ensure compliance with Environmental Permit EPR-BB3793ND. **This has been recorded as a category 2 breach of permit condition 3.1.1.**

General observations:

The site was generally well organised with good segregation of waste streams observed.

Housekeeping was observed to be poor in certain areas of the site, and waste was found to have accumulated in the concrete A frames and around the bund of the treatment / storage pad.

Waste stockpiles were notably reduced in comparison with previous inspections. However, waste continued to be stored outside the permitted boundary, including material awaiting processing that was not located on the concrete pad.

Many thanks 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.