

Compliance Assessment Report CAR_NRW0052523

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: Other.

On: 23/07/2026 between 10:45 and 13:20.

Parts of permit assessed: Previous identified actions and W3F - Pests.

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

Report sent to: Adrian Stewart , TCM, on 12/08/2026.

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	Ongoing (O)	3.1.1
W2D - Waste - Operations - The site	Ongoing (O)	2.4.1
W3F - Waste - Emissions and monitoring - Pests	Action only (X)	

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?

Criteria	Action needed	Complete by
W3F	Follow sections of approved PMP to reduce fly activity and prevent breeding cycle, and ensure compliance with PMP and permit conditions.	17/08/2026
W2D	Ensure that all wastes are removed and stored in accordance with permit condition 2.4.1. and within permit boundary.	10/08/2026
W3F	Review PMP and submit new version	30/09/2026

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 Thursday 23 July 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 during the inspection were David Ellar and Alex Underhill (Natural Resources Wales), the Site General Manager and TCM (AMG Resources Limited), the external Pest Contractor, and the Environmental Consultant. NRW officers were accompanied around the site by these representatives.

The weather was fine, dry and hot.

Previous inspection (CAR_NRW0052443):

The site was previously visited on the 14/07/2026 by Alex Underhill (NRW). During this inspection a category 2 permit breach was recorded under W3F (Pests).

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.

Permit Breaches:

W3F – Pests – **Ongoing (score suspended)**: A Category 2 permit breach against W3F (Pests) and condition 3.1.1 of the permit was identified during the previous inspection (see CAR_NRW0052443 for full detail) and actions were set. The actions from this CAR had not yet been completed and were still within the compliance deadline.

An action is also set to review the current PMP for the site.

W2D – The site – **Ongoing (score suspended)**: A Category 2 permit breach against permit condition 2.4.1. was recorded during a previous inspection (see CAR_NRW0052054 for full detail) for waste stored outside permitted area. The actions from this CAR (and Regulation 36 enforcement notice) had not yet been completed and were still within the compliance deadline. Waste was still present outside the permitted area during this visit.

Pest Management

An inspection of fly monitoring and capturing methods were reviewed on site. Monitoring boards indicated significant fly activity, particularly on boards located near waste

processing activities. The monitoring boards around the perimeter of the site showed less fly activity than previous visits and the Pest contractor said he had recorded a downward trend in overall number. High numbers of flies were observed on the unprocessed waste piles near the edge of the treatment pad.

All monitoring pads were securely fixed to the boards and were being replaced weekly.

Housekeeping

Whilst general housekeeping around site was satisfactory, an accumulation of waste had built up in the A-frames and in the gaps between the A-frames and the site bund.

Windblown litter was present especially around the Northeastern boundary of the site.

These are issues that have also been highlighted at previous inspections and believed to be linked to the increased fly activity.

Due to the continued breach of permit condition 3.1.1, NRW have taken the step to issue an Environmental Permitting (England and Wales) Regulations 2016 Regulation 37(1) and (5) partial suspension notice. The reason for this decision is that, Natural Resources Wales consider that the operation of the regulated facility involves a risk of pollution namely: Failure to comply with Permit condition 3.1.1.:

3.1.1 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.

This notice was issued at the time of inspection, will come into effect from 18:00 on the 24/07/2026 and will remain in place until NRW is satisfied that appropriate actions have been completed and implemented to ensure compliance with permit condition 3.1.1.

Pest Management Plan (PMP)

Section 8.4 of the PMP states 'This PMP will be reviewed and updated at the end of each summer and following any incidents to determine the effectiveness of controls and to determine whether additional control measures are required. The current PMP is not sufficient to mitigate the risk of fly infestation and needs review. Recent inspections have identified areas which need review:

Monitoring

Monitoring pads have previously been missing or detached from boards. In addition, data is not currently recorded on fly numbers or species, and it is therefore unclear how monitoring results are used to inform treatment measures

Seasonal / high fly count triggers

Consideration should be given to introducing trigger-based actions linked to seasonal conditions (e.g. hot weather) or elevated fly counts, such as reducing waste inventories, increasing stock rotation, or implementing additional control measures.

Waste acceptance

It has been noted that deliveries of infested waste may have contributed to high fly numbers on site. Further consideration of waste acceptance checks and quarantine measures is required.

Waste storage / rotation

The PMP states that waste should remain in temporary storage for less than 10 days and be managed on a first-in, first-out basis. However, it is currently unclear how this is achieved in practice. Consideration should be given to the use of storage bays, stock identification systems, or other measures to demonstrate effective stock rotation.

Please review your current PMP titled PEST MANAGEMENT PLAN (PMP) Report Number 2056r1v3d0322 and dated March 2022, giving consideration to the above, and using findings from your recent investigations, monitoring and actions. Please submit the reviewed document to NRW by 30/09/2026.

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.