

## Compliance Assessment Report CAR\_NRW0052621

**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:** 05/08/2026 between 12:00 and 13:20.

**Parts of permit assessed:** assessment against Enforcement Notices.

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

**Report sent to:** Adrian Stewart, TCM, on 14/08/2026.

### 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            |
| 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 |
|--------------------------------|----------------------------|
| 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  |

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 site inspection was undertaken on 05/08/2026 to assess compliance with the requirements of Standard Rules Permit SR2008 No.21 (75kt Metal Recycling Site), Permit No. EPR/BB3793ND, held by AMG Resources Limited.

Present during the inspection were David Ellar, Edward Davies and Alex Underhill (Natural Resources Wales), the Site Technically Competent Manager (TCM), the General Manager (AMG Resources Limited), and the site's external pest control contractor.

The weather was dry, hot and sunny.

#### **Purpose of Inspection**

To assess compliance with the permit and review progress against the following enforcement notices:

1. Environmental Permitting (England and Wales) Regulations 2016, Regulation 36 Notice issued on 20/07/2026.
2. Environmental Permitting (England and Wales) Regulations 2016, Regulation 37(1) and 37(5) Suspension Notice issued on 22/07/2026.

NRW officers were accompanied around the site by the operator's representatives and the external pest control contractor.

#### **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.

**Regulation 36 Enforcement Notice (Issued 20/07/2026)**

This Notice required the operator to store waste in accordance with Permit Condition 2.4.1 and within the permitted boundary. The compliance deadline for this notice is 10/08/2026.

Good progress had been made in addressing the requirements of the notice.

The permit boundary had been clearly marked using several stacks of painted tyres.

Photograph showing boundary markers:



During the inspection, some waste remained outside the permitted boundary. However, this consisted of uncontaminated scrap metal and was considered to present a relatively low environmental risk.

The operator stated that all remaining waste would be relocated within the permitted boundary before the notice deadline.

**Regulation 37(1) and 37(5) Suspension Notice (Issued 22/07/2026)**

This notice partially suspended the permit and prohibited the acceptance of specified waste streams, primarily metallic packaging waste, until the required actions had been completed.

Significant progress had been made since the notice was served.

The operator confirmed that no waste (metallic packaging waste) had been accepted at the site since the suspension notice was issued. This had contributed to a noticeable reduction in the volume of waste stored on site.

During the inspection, it was noted that:

- Waste volumes had been significantly reduced and clear areas were evident on the treatment and storage pad.

- Waste had been cleared from the A-frames.
- Waste had been cleared from the gaps between the A-frames and the bund wall.
- Windblown litter remained evident in various areas of the site.
- Fly monitoring records and fly count data demonstrated stable, low levels of fly activity across the site.

Photograph showing A-Frames and bund gap free from waste:



The inspection identified good progress against both enforcement notices. Waste volumes had reduced significantly and fly activity appeared to be declining based on the monitoring data provided.

Further work remained necessary to:

- Ensure all waste was stored within the permitted boundary before the Regulation 36 Notice deadline of 10/08/2026.
- Address the remaining windblown litter.
- Complete all outstanding actions required by the Regulation 37 Suspension Notice.
- Continue to provide evidence demonstrating that fly activity at the site remained stable and at low levels.

The operator advised that the remaining actions required under the suspension notice would be completed shortly and that photographic and documentary evidence would be

submitted to NRW to enable a further assessment of compliance with the notice requirements.

While good progress had been made against both notices, neither notice was considered fully complied with at the time of the inspection. NRW would continue to monitor progress and assess compliance with the requirements of both notices.

\* update: On 06/08/2026, photographic evidence was provided by the operator demonstrating that the windblown litter had been cleared from the site. Fly count data was also provided, showing very low levels of fly activity across the site.

This evidence was considered alongside the observations made during the inspection, and NRW was satisfied that fly activity associated with the site was at a low and stable level and that the site was unlikely to be a contributing source of fly activity within the surrounding area. Consequently, the Regulation 37(1) and 37(5) Suspension Notice was withdrawn.

Thank you for your time and assistance 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](mailto: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](mailto: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.