

Compliance Assessment Report CAR_NRW0052716

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: 18/08/2026 between 11:20 and 12:20.

Parts of permit assessed: W1A, W2D and compliance against enforcement Notice.

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

Report sent to: Adrian Stewart, TCM, on 20/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2D - Waste - Operations - The site	C3 Minor	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
1	4

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
W2D	All wastes must be stored in accordance with permit condition 2.4.1. and within the permitted boundary.	11/09/2026

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 site inspection was undertaken on 18/08/2026 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 and Alex Underhill (Natural Resources Wales), the Site Technically Competent Manager (TCM) and General Manager (AMG Resources Limited).

The weather was overcast but still warm.

Purpose of Inspection

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

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

NRW officers were accompanied around the site by the operator's representatives.

Permit Breaches:

W2D – The site – 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 waste was still present outside the permitted area during this visit. It was noted that all contaminated packaging and waste had been removed early in the notice period and that a significant quantity of material had been removed. Only clean, uncontaminated scrap metal remained, the majority of which was stored on a concrete surface.

Due to the reduced environmental risk posed by the waste remaining outside the permitted boundary, the compliance classification has been revised and this breach **has been recorded as a Category 3 noncompliance**.

ACTION: All wastes must be stored in accordance with permit condition 2.4.1. and within the permitted boundary.

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 specified within the notice was 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, the contaminated

can waste had been removed and a significant amount of the clean scrap had left site or been moved to within the permitted area.

During this inspection, a large quantity of waste was observed still outside the permitted boundary. This consisted of uncontaminated scrap metal, was mostly contained to areas of hardstanding and was considered to present a relatively low environmental risk.

Photograph showing waste remaining outside of permitted area:



As waste remained outside the permitted area beyond the compliance deadline, NRW has determined that the requirements of the notice have not been met and will consider appropriate enforcement action. A new enforcement notice will be issued to secure compliance against the permit.

General observations

Waste stocks were significantly lower than seen in previous inspections and there was clear separation between processed, unprocessed and different waste types. There were large areas of the treatment / storage pad that had been kept free from waste and the operation was well organised.

Pest Management

Fly monitoring and control measures were reviewed during the inspection. All monitoring boards / pads and fly capture bags were in place, had been recently changed. They showed very low fly activity.

Monitoring is still being undertaken regularly and treatment is being carried out due to the sustained high temperatures. Weekly updates and summaries are being sent to NRW.

Housekeeping

House keeping was generally good, A-frames and surrounding areas were free from residual waste however, windblown litter was evident across the site. The operator was

aware of this and stated it would be cleared and processes were being reviewed to prevent further issues.

Photograph showing A-frames clear of waste:



Pest Management Plan

A previous CAR (CAR_NRW0052523) had noted that the current PMP was not sufficient to control the risk of fly infestation and needed to be reviewed. An action was set to review your current PMP titled 'PEST MANAGEMENT PLAN (PMP) Report Number 2056r1v3d0322' and dated March 2022. The reviewed document must be submitted to NRW **by 30/09/2026**. This action remains outstanding and will continue to be monitored until completed.

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

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.