Compliance Assessment Report CAR_NRW0052333

Permit being assessed: PP3092FN.

For: S & R Metals, **held by:** Rosalind Jones

At: Llithfaen, Pwllheli, Gwynedd, LL53 6NH.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 15/06/2026.

Parts of permit assessed: As below. .

NRW Lead Officer: Cheryl Griffiths.

Report sent to: Rosalind Jones, Operator, on 25/09/2026.

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	C3 Minor	1.1.1(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
W1A	Ensure that S & R Metals has a suitably qualified Technical Competent Manager in place at all times whilst the permit remains active.	31/07/2026

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

On 15 June 2026, Natural Resources Wales (NRW) officers, Cheryl Griffiths, Kieran Evans and Kevin Jones visited Rosalind Jones at 5 Gors Ty`n Rhos, Llithfaen, Pwllheli, Gwynedd, LL53 6NH to hand-deliver a copy of the most recent Compliance Assessment Report (CAR_NRW0051906) following a review of your annual waste returns. Within this CAR report, actions were requested for S & R Metals to complete by 6 July 2026. The outcomes of those actions are outlined below.

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W1A - General Management

As stated in permit condition 1.1.1.(a), ***"the activities shall be managed and operated by sufficient persons who are competent in the respect of the responsibilities to be undertaken by them in connection with the operation of the activities".***

NRW requested the operator to provide a copy of the current Technical Competent Manager's (TCM) most up-to-date Continuing Competence certificate by no later than 6 July 2026.

At the time of our visit, NRW contacted the operator by telephone as they were not present at the site address. During telephone conversation, it was confirmed that the current Technical Competent Manager for S & R Metals was Rosalind Jones. Following a review of the CIWM (WAMITAB) qualifications records, NRW identified that Rosalind last completed the Continuing Competence Programme on 19 September 2016.

On 25 June 2026, NRW received an email from Stephanie Critchley confirming that, from 1 July 2026, Stephanie had been appointed as the Technical Competent Manager for S & R Metals. A subsequent review of the CIWM (WAMITAB) qualifications records confirmed that Stephanie successfully completed the Continuing Competence Programme on 26 May 2026.

Please note that Continuing Competence certification remains valid for two years from the date shown on the certificate. S & R Metals will therefore be required to submit an up-to-date Continuing Competence certificate to NRW by 30 June 2028.

NRW has determined that S & R Metals operated for a period without a suitably qualified Technical Competent Manager in place. This constitutes a breach of permit condition 1.1.1(a) and has resulted in a compliance score being issued.

Actions:

- ***Ensure that S & R Metals has a suitably qualified Technical Competent***

Manager in place at all times whilst the permit remains active.

- **Provide NRW with an updated copy of the TCM continuing competence certificate upon expiry of the current certificate.**

A CCS Category 3 score has been issued in relation to this non-compliance against permit condition 1.1.1(a) – General Management. NRW identified that the site's TCM completed their training on 19 September 2016, but no continuing competence assessments have been undertaken since. Consequently, the site operated without demonstrating compliance with the technical competence requirements, until a new TCM was appointed on 1 July 2026.

Whilst the site did not have a technically competent manager in place, a Category 3 score has been assigned due to the low level of waste activity at the site and the consequently reduced potential for environmental impact

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W4A - Records

As stated in permit condition 4.1.1(a), *"All records required to me made by this licence shall be legible".*

Following a review of the annual waste return, NRW requested that S & R Metals complete their waste returns using the correct and most up-to-date template and re-submit them by 6 July 2026.

On 25 June 2026, the newly appointed TCM submitted a copy of the 2025 annual waste return using the updated template to waste.returns@cyfoethnaturiolcymru.gov.uk

NRW is satisfied that this action has been completed and no further action is required in relation to this matter.

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NRW would like to thank S & R Metals for their assistance and cooperation during this compliance assessment. Should you have any questions regarding the contents of this inspection report, please do not hesitate to contact us.

Any compliance criteria not highlighted within the above summary should be considered as not assessed.

"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."

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ENDS

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.