Compliance Assessment Report CAR_NRW0053159

Permit being assessed: GP3193MV.

For: M & R Commercials Vehicle Dismantling & Recycling Facility, **held by:** T M Wiberg Limited

At: Plots P & W, Nant Y Felin, Swansea, W Glamorgan, SA5 4HG.

Type of assessment: Site Inspection,

Reason: Routine.

On: 02/10/2026 between 09:00 and 17:00.

Parts of permit assessed: W1A, W2A & W3G..

NRW Lead Officer: David Ellar, accompanied by Michael Edwards.

Report sent to: Mal Wiberg, Operator, on 07/10/2026.

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	C2 Significant	1.1.1
W2A - Waste - Operations - Permitted activities	C2 Significant	2.1.1 and Table 2.1
W3G - Waste - Emissions and monitoring - Fire	C2 Significant	3.4.1

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
3	93

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	Update the Environmental Management System so that it accurately reflects current site activities and control measures and is in line with current NRW guidance and submit to NRW	30/11/2026

Criteria	Action needed	Complete by
	to review.	
W2A	Ensure that all wastes are removed and stored in accordance with permit condition 2.1.1.	30/11/2026
W3G	Ensure that the site is operated in line with the current FPMP	30/11/2026

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

A routine site inspection was undertaken on Friday 01 October 2026 to assess for progress against actions set following previous visit, and compliance against the Standard Rules (SR2011No3 – vehicle storage, depollution & dismantling (authorised treatment) facility) - Permit No: GP3193MV held by T M Wiberg Limited.

Present at the time of the inspection were: David Ellar, Michael Edwards (Natural Resources Wales) and the Director (T M Wiberg Limited). The weather was fair and dry.

Previous inspection:

The site was visited in June by David Ellar (NRW) and several significant noncompliance's were recorded, see CAR_NRW0052254 for full detail. Whilst some improvements had been made e.g. reduction in waste from the rear of the site, none of the actions noted following the previous inspection had been completed.

Permit breaches identified:

General Management - W1A - Category 2 Condition 1.1.1 of the permit states 'The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non- conformances, closure and those drawn to the attention of the operator as a result of complaints.

The EMS for the site is dated December 2012 and does not fully reflect current waste operations at the site. The operator has previously confirmed with NRW that they will be working towards developing a new Environmental Management System (EMS) in line with the current working practices of the site but this is yet to be submitted to NRW. Ongoing non compliances at the site are a direct result of the operator failing to operate in line with a written management plan that both identifies and reduces the potential pollution risk to the environment. This failure represents a significant lapse in management and operational control reducing the sites ability to maintain

effective pollution prevention measures and increasing the likelihood of significant environmental incidents. Previous inspections have highlighted the need for an updated EMS, meaning the operator has failed to act on known risks. The operator explained that they had engaged with a consultant and a new or updated EMS will be submitted to NRW. **This has been scored as a Category 2 breach of condition 1.1.1 (a).**

Action - Update the Environmental Management System so that it accurately reflects current site activities and control measures and is in line with current NRW guidance and submit to NRW to review.

Waste Operations - W2A & W2C - Category 2 There is a significant volume of waste stored at the rear of the building on an area of impermeable surface which had been in situ in excess of the allowed storage period under the permit. Permit condition 2.1.1 and Table 2.1 states: 'that wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery'. Whilst it is apparent that some waste has been processed and removed from site, a considerable amount remains in place despite previous actions (including an Enforcement Notice) placed on the operator to remove it; the environmental risk has not reduced. During a previous inspection the operator explained that a trommel is in the process of being purchased / rented and the rest of the waste will be screened and removed as a priority; this has not been the case and waste pile was similar to that seen during the previous visit. Waste that remains on site beyond permitted timeframes is more likely to degrade, generate leachate, increase fire risk and potentially cause pollution. Whilst a small reduction in waste is acknowledged, this has not resulted in a material reduction in environmental risk, hence not reducing the category breach from the last inspection. **This has been scored as a Category 2 breach of permit condition 2.1.1.**

Action - Ensure that all wastes are removed and stored in accordance with permit condition 2.1.1.

Photograph of the waste pile:



Fire - W3G – Category 2. Condition 3.4.1 of permit states 'The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire

prevention plan guidance'. The site does have a Fire Prevention and Mitigation Plan (FPMP) dated February 2019 (referenced as: 1877r1v1d0219), which details mitigation measures set out to reduce fire risk. The site however was found not to be operating in accordance with the current FPMP during the inspection. Onsite waste storage practices were found not to be reflected by the FPMP and the 3.7m Standoff was not in place. 'Figure 2' of the FPMP is a plan of the site showing waste storage and a 3.7m standoff around the perimeter of the site for FRS access. The standoff distance is a critical element of approved fire mitigation design. Failure to maintain it significantly reduces the site's ability to comply with fire prevention guidance and increases the chance of a serious fire incident. **This has been scored as a Category 2 breach of permit condition 3.4.1.**

Action - Ensure that the site is operated in line with the current FPMP.

It was noted that the permit breaches detailed above are the same as noted in the last few site inspections. Little progress has been made remedy the issues identified and for the operator to return to compliance.

Given the significance of the breaches above, NRW will have to consider its enforcement response. You will be written to separately regarding this decision.

General observations:

The ongoing issue with pooling of water at the rear of the site had improved since the last inspection but this is potentially due to the recent dry weather. The operator explained that a contractor working on behalf of the Local Authority had been in touch to organise work on the culvert to the rear of the property. Blocking of this culvert is thought to be partially responsible for the issue.

Vehicle depollution takes place in the treatment shed, however no depollution was being undertaken at time of inspection. The area was being used as general maintenance and storage area. This area must be cleared out and organised before vehicle depollution can take place.

Photographs showing ELV treatment area used as storage:



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.