

Compliance Assessment Report CAR_NRW0049597

Permit being assessed: AB0041901

For: SCA PACKAGING ALEXANDRA DOCKS, held by PAUL BALDOCK

At: SCA PACKAGING NEWPORT, ALEXANDRA DOCKS, NEWPORT, WALES, .

Type of assessment carried out: Site Inspection, Reason: Routine.

On 10/09/2025, between 10:02 and 11:05.

Parts of permit assessed: Site operations and infrastructure

NRW Lead Officer: Elis Nuttall.

Report sent to: Phillip Stevens, QSE Manager, on 17/10/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B1 - Water Quality - Operations - Permitted activities	C4 No impact	4 - Sample Point
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Ongoing (O)	5 - Volume
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C3 Minor	6 - Volume
WQ-B2 - Water Quality - Operations - The site	Action only (X)	

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-B1	Begin the variation process to change the sample point location to reflect its true location on site.	17/11/2025
WQ-C1	Begin daily flow monitoring to ensure compliance with condition 5 of the permit. Evidence shall be provided to NRW that this is being undertaken.	17/11/2025
WQ-C1	Inform NRW of the arrangements in place so that the daily discharge volume can be measured or determined.	31/10/2025
WQ-B2	Investigate and provide the technical specifications of the treatment system to NRW as evidence of treatment capacity and that it is still fit for purpose.	17/11/2025

Action 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

Site Visit Report

This report details the site visit made by Natural Resources Wales (NRW) on the 10/09/2025 to Saica Pack Newport (referred to as *SCA Packaging Newport* in the permit documentation), permit reference number EPR-AB0041901.

I (NRW Environment Officer Elis Nuttall) attended Saica Pack Newport, Alexandra Docks, Newport at 10:02 for a water quality permit compliance inspection where I met with the site's QSE Manager (PS). The weather was wet with persistent rain during the visit.

General Observations

This is a large manufacturing site with welfare facilities for the use of staff and site operators. The permit consents the discharge of biologically treated sewage effluent from a package sewage treatment works to the River Usk Estuary at ST31908412. A sample point shall be provided and maintained at ST31908413.

The discharge shall not contain any trade effluent or exceed 12m³/day. Regarding composition, while there are no numeric limits listed the discharge shall not contain any poisonous, noxious or polluting matter or any solid waste matter.

The site was operational at the time of the visit.

Initial Discussion

This is the second compliance visit to the site by NRW, the first being in August 2023. I began my inspection by discussing the site's operational history, including this previous visit, with PS. During the previous visit two category 3 breaches were issued, one for the composition of the discharge (fungus and particulates were observed to be discharging) and the second for the lack of flow monitoring structure. Actions were set to rectify both issues.

Maintenance was undertaken in January 2024 after the previous visit which included a full service, remedial actions (replacement parts where needed etc), tanking of waste and cleaning of working area. It was stated that these actions rectified the composition issues observed and that the system was now working as designed. Evidence of this work in the form of a service report was provided during this discussion (physical copy), to which I was happy to accept as an appropriate record and completion of the action. No other major, non-routine works have been undertaken on the system.

Regarding the need for a flow monitoring structure, PS noted that they were not aware of a formal "structure" being installed but queried the wording of the permit regarding what a

structure would be. It was claimed that any testing needed could be undertaken via the outlet of the package sewage treatment works into a chamber at ST3190084146. I advised while a permit requirement, I would query whether the described access point would be sufficient as a flow monitoring structure with senior NRW officers. After an internal discussion with a senior, it was agreed that the access point could be appropriate as long as the site can provide evidence on how the daily volume of the discharge can be measured or determined as required by condition 6 of the permit. I have actioned this below with further details.

When I requested to see/be provided with flow monitoring data for the treated discharge, PS noted that no datasets on discharge volume were available. This is a breach of condition 5, as evidence of compliance is not available. This breach has been consolidated with the ambiguity of the flow monitoring structure, details of which have been outlined below.

Regarding the system itself, no specifications or details on the treatment capacity were known at the time of the visit. The only information held by the site is that which can be found within the permit documentation. As a result I have actioned the operator to investigate the system to ascertain its specifications. See details below.

As noted above, significant maintenance was conducted in January 2024. The most recent maintenance undertaken was a de-sludge and tanking of waste on 08/09/2025. Evidence of this work in the form of a physical waste transfer note was provided during this meeting.

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No further questions were raised. We then proceeded to inspect the site infrastructure.

Site Infrastructure

General site access was good at the time of the visit, with all infrastructure unobstructed and available for inspection. The tank covers were secure with no damage or gaps present. It was confirmed by PS that the system only receives sewage effluent from the site's welfare facilities, with no trade effluent or surface water entering the tank. Each chamber was inspected in sequence, with the observations made outlined below, and evidenced in Figure 1.

1. Primary effluent chamber – The chamber was as expected with sufficient capacity for holding waste prior to treatment. There were no maintenance concerns present, with the pumps and filter clearly working.
2. Filter chamber – The filters were observed to be in good working order and screening solid material as designed. There was no buildup of solids on the filter drums and there was no excessive carry over of solids.
3. Secondary settlement chamber – This chamber included primarily liquid effluent as expected, with very minimal solids present. Sufficient capacity was observed with no other concerns noted.

4. Final effluent discharge chamber – The final effluent discharging was clear with no solids or fungus visibly present and no odour perceived. There were some settled solids present in the bottom of the chamber, but this was not restricting the flow of effluent and was not being mobilised into the water column. An advisory note to clear these solids from the chamber on the next round of maintenance has been added as a precautionary measure. Additionally, the chamber cover was very rusty, posing a risk to infiltration from water and sediments. Another advisory action to replace this cover has been noted.



Figure 1 – The system chambers as observed during the visit.

From top to bottom, left to right: Primary effluent chamber, filter chamber, secondary settlement chamber, final effluent and discharge chamber

From the discussions held on site with PS, it became apparent that the sample point listed in the permit was not accessible and the only location that the treated effluent could be

accessed prior to discharge was within the final effluent discharge chamber. This was described by PS as the sample point in practice. While not in a restricted location, this is not the listed permit point and as such could lead to confusion if access is required by an attending officer who was not familiar with the system or its access points. The disparity in these locations is highlighted in Figure 2. As a result, I have actioned that an application to vary the permit to reflect the accurate location of this sample point be undertaken. Further details are provided below.

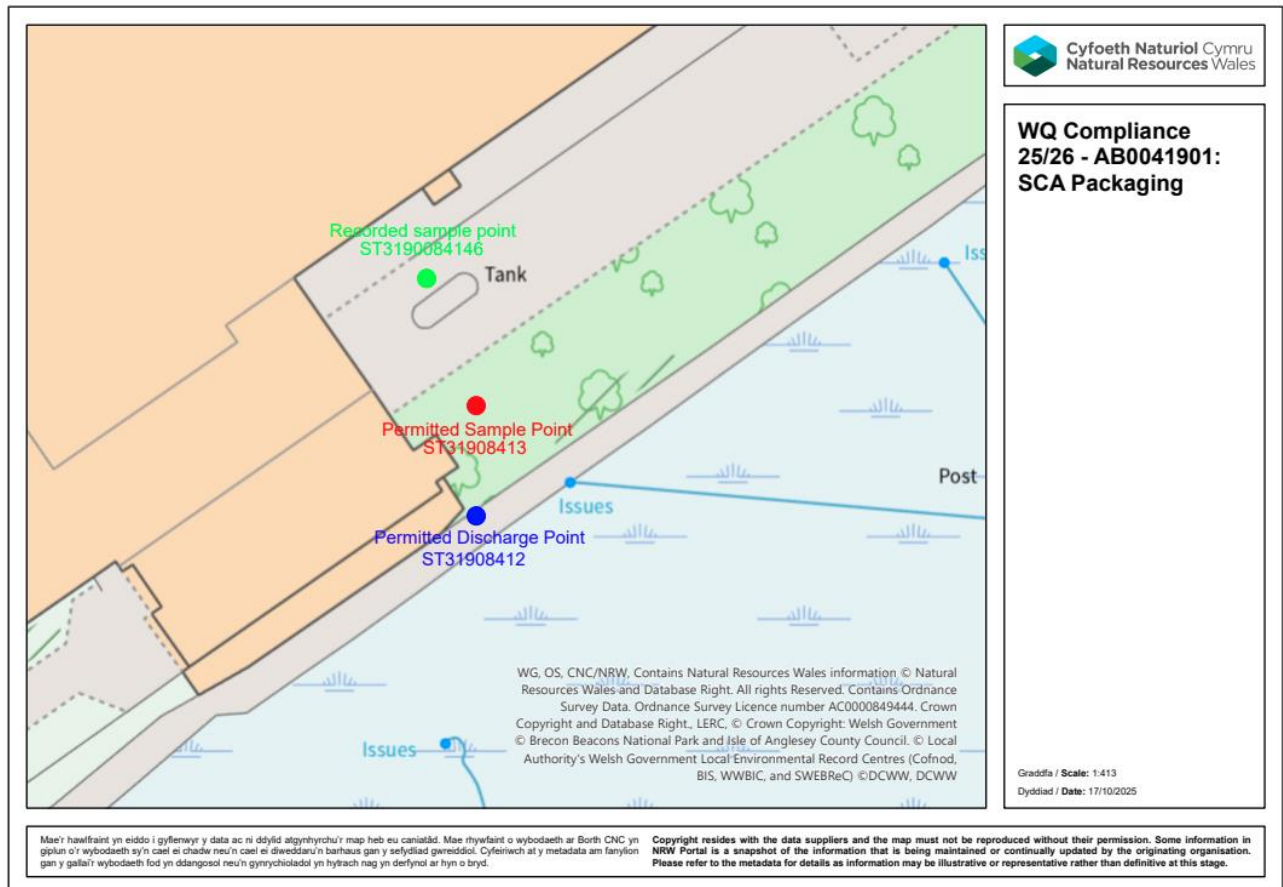


Figure 2 – The difference between the locations of the permitted and recorded sample points during the visit. The discharge point to the Usk is also visible.

The discharge point (location also observed in Figure 2) was not accessible due to its location in an estuarine environment (Figure 3). However, there was no observable pollution or odour present. As such I am content that the system is working as designed and not causing any polluted discharges.



Figure 3 – The view from site looking out over the estuary in the direction of the discharge pipe during the visit.

No further observations were made during this inspection. We returned to the office for a discussion on the visit.

Final Discussion

On returning to the office, I outlined my observations and actions to PS. The query regarding the flow monitoring structure was reiterated (which is explained above) but no new questions were raised.

I left site at 11:05.

Breaches of permit conditions

Below are the permit breaches that were identified during the site inspection.

1. CATEGORY C4 BREACH – PERMIT CONDITION 4 – Sample Point

A sample point shall be provided and maintained at National Grid Reference ST31908413, as shown marked 'Sample Point' on Plan AB0041901, so that a representative sample of the Discharge may be obtained.

There is a disparity in the locations of the permitted sample point and the location described as the discharge point in practice. While this may not currently be affecting the discharge and not impacting the environment, it may lead to issues if the sample point is trying to be located by officers who are not familiar with the site. As such, it has been scored accordingly.

Please see report content for further justification

2. CATEGORY C3 BREACH – PERMIT CONDITION 6 – Volume

A flow measurement structure shall be provided and maintained to enable the daily volume of the Discharge to be measured or determined as required.

It was noted that no formal “structure” was in place to enable flow monitoring. While the treated effluent can be accessed, and the operator stating this could constitute a flow monitoring structure, they will need to provide evidence on how the daily volume of the discharge can be measured or determined as required by condition 6 of the permit. This information was not available at the time of this inspection.

Please see report content for further justification

This score has been consolidated with a breach of Condition 5 regarding the lack of volume data available due to no flow measurement structure being in place. However, a separate action has been set to address this additional breach.

Actions required by dates specified

1. Begin the variation process to change the sample point location to reflect its true location on site.

Deadline: 17/11/2025

2. Inform NRW of the arrangements in place so that the daily discharge volume can be measured or determined.

Deadline: 31/10/2025

3. Begin daily flow monitoring to ensure compliance with condition 5 of the permit. Evidence shall be provided to NRW that this is being undertaken.

Deadline: 17/11/2025

4. Investigate and provide the technical specifications of the treatment system to NRW as evidence of treatment capacity and that it is still fit for purpose.

Deadline: 17/11/2025.

If we do not receive the information requested within specified deadline and have not been informed as to why there is a delay then we may serve a Regulation 60 Notice requiring the information under Environmental Permitting (England and Wales) Regulations 2016.

Other advisory comments

1. Clear the settled solids out of the final effluent discharge chamber during the next tanking operation.
2. Replace the rusty final effluent discharge chamber cover to ensure no infiltration from water or sediments.

Please note, these comments are advisory and not linked to any permit conditions. No updates will be requested.

Contact details:

If you have any queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details: Elis Nuttall, Environment Officer, elis.nuttall@cyfoethnaturiolcymru.gov.uk, 03000 65 4651.

Thank you,
Elis Nuttall.

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 to 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 only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend non-compliance for up to six months to allow time for remedial action to be taken. These will be re-instated if the action is not completed.

Full list of water quality action criteria (used in section 1 and 2):**WQ A: Management**

- WQ-A1 General management

WQ B: Operations

- WQ-B1 Permitted activities
- WQ-B2 The site
- WQ-B3 Operating techniques
- WQ-B4 Improvement programme
- WQ-B5 Pre-operational conditions

WQ C: Emissions and monitoring

- WQ-C1 Emissions to water
- WQ-C2 Emissions to land
- WQ-C3 Emissions of substances not controlled by emission limits
- WQ-C4 Installation of monitoring boreholes

WQ D: Information

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

Enforcement response

Any permit condition non-compliance 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 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.