

Compliance Assessment Report CAR_NRW0050951

Permit being assessed: BB3790FX.

For: ALUK (GB) LTD, **held by:** ALUK (GB) Ltd

At: Aluk GB Ltd, Newhouse Farm Industrial Estate, Mathern, Chepstow, Monmouthshire, NP16 6UD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 04/03/2026 between 10:30 and 13:00.

Parts of permit assessed: See comments section.

NRW Lead Officer: David Thomson, accompanied by Wayne Grimstead.

Report sent to: Redacted, Health, Safety and Environment Manager, on 06/03/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - 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?

No action required.

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.

At this time, we do not intend to take any further action.

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

Attendees

Natural Resources Wales

David Thomson [Senior Officer, Industry Regulation]

Wayne Grimstead [Team Leader, Industry Regulation]

ALUK (GB) Limited

Redacted [HSE Manager]

Redacted [Water Treatment Plant Technician Team Leader]

Redacted [QHSE Technician]

Redacted [Quality Manager]

Site Visit Overview

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter NRW) planned site visit to ALUK (GB) Limited, Chepstow Aluminium Treatment Plant (hereafter 'the operator') on 04 March 2026.

The reason for this visit was for the recently appointed Industry Regulation Officer [David Thomson], who is responsible for regulating this installation, to become familiar with on-site operations & activities and to meet the ALUK (GB) Ltd environment management team.

It should be noted that the officer previously responsible for regulating this site retired in late 2024 and due to the operators good permit compliance record, NRW decided to defer routine site inspections until a new designated site officer was appointed. This was explained to the operator during the last site inspection on 21 May 2024. Details of this discussion are recorded in Compliance Assessment Report CAR_NRW0044349.

A review of permit non-compliance issues and incidents prior to the site visit on 04 March 2026 found no permit condition breaches relating to reporting of monitoring data, exceedances of permitted emission limits or public complaints during this deferred period.

After initial introductions were made, a site tour was provided by the operator covering aluminium pretreatment processes, rinse process, chrome free coating, drying process, powder coating process, curing process, effluent treatment processes and on-site laboratory processes. The operator also explained the sampling and monitoring undertaken for emissions to air, water and sewer as required by their environmental permit. The operator informed NRW that the anodising process has not been used since approx. 2021-2022 but equipment is still available on-site if anodising aluminium is required in the future.

Following the plant tour, the operator shared two MS Excel files containing monitoring results for emissions to air water and sewer. Some of these results were generated by the on-site laboratory, with other results provided by Dwr Cymru Welsh Water and an external UKAS accredited lab. The operator explained that daily effluent monitoring results produced at the on-site laboratory are used for process control whereas the weekly results from the UKAS accredited lab are used for monitoring and reporting requirements as per their environmental permit.

The operator queried if an Operator Monitoring Assessment (OMA) would be undertaken this year as the last one was completed in August 2022. NRW stated that an OMA is typically carried out once every 4 years and that its inspection programme for 2026/27 hadn't yet been decided. ALUK would receive advanced notice if an OMA was scheduled.

NRW informed the operator that a revision of the Best Available Techniques Reference Document (BREF) for the Surface Treatment of Metals and Plastics (STM) sector is still ongoing and advised them to contact their trade association so that they can have an input into this review process. The following hyperlink can be used for tracking the status of UK Best Available Technique Conclusions (BATC) reports for Surface Treatments of Metals and Plastics: WWW.UK BATC - GOV.UK

The operator was advised that future submissions of reporting forms (e.g., monitoring data & annual performance data) and notifications (e.g., Schedule 5 Parts A and B) as well as other queries relating to their environmental permit should be sent to David Thomson.

Finally, the operator agreed to provide process-flow documents to NRW to support and clarify the site visit discussions. These documents have already been received.

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 Industry compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – 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.