

## Compliance Assessment Report CAR\_NRW0052454

**Licence being assessed:** WA/067/0008/006.

**For:** Underground Strata at Alyn Works, **held by:** Synthite Ltd.

**At:** .

**Type of assessment:** Audit,

**Reason:** Routine.

**On:** 21/07/2026, between 13:00 and 15:30.

**Parts of licence assessed:** See below

**NRW Lead Officer:** Libby Hughes, accompanied by Ricky Hartleb.

**Report sent to:** EHS Manager, EHS Manager, on 11/08/2026.

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

| Part of licenced activity assessed (criteria)                                          | Assessment result | Non-compliant licence condition |
|----------------------------------------------------------------------------------------|-------------------|---------------------------------|
| WR-A2 - Water Abstraction - Abstraction specified by licence - Points of abstraction   | Assessed (A)      |                                 |
| WR-A3 - Water Abstraction - Abstraction specified by licence - Means of abstraction    | Assessed (A)      |                                 |
| WR-A4 - Water Abstraction - Abstraction specified by licence - Purposes of abstraction | Assessed (A)      |                                 |
| WR-A6 - Water Abstraction - Abstraction specified by licence - Quantities              | Assessed (A)      |                                 |
| WR-B1 - Water Abstraction - Abstraction measurement and records - Means of measurement | Action only (X)   |                                 |
| WR-D1 - Water Abstraction - Environmental monitoring and Information - Recording       | C3 Minor          | 9.3                             |

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

### 2. What action is required?

| Criteria | Action needed             | Complete by |
|----------|---------------------------|-------------|
| WR-B1    | See Action 1 below        | 26/08/2026  |
| WR-D1    | See Actions 2 and 3 below | 26/08/2026  |

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 or civil sanctions being imposed depending on the circumstances of the offence.

**You are non-compliant with your licence.**

**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

NRW officers undertook an inspection of the water abstraction activities authorised by licence WA/067/0008/006 on the 21<sup>st</sup> July 2026.

#### **WR-A2 Point of Abstraction**

The abstraction points A and B were inspected and found to be located as specified within the licence. Both abstraction points were secure.

#### **WR-A3 Means of Abstraction**

The boreholes were inspected and no issues were identified in relation to licence condition 3.

At point A the water depth was measured as 3.6m below ground level using the borehole level gauge.



At point B the water depth was measured as 5.55m below ground level.



#### **WR-A4 Purpose of Abstraction**

Groundwater abstraction from boreholes A and B and off-site surface water drainage via

"Parry's Ditch" is a requirement of the Installation Permit EPR/BU2349IL - Synthite Ltd, to prevent site flooding.

This abstraction licence (WA/067/0008/006) permits the combined abstracted water from Boreholes A and B to be used for evaporative cooling purposes. The operator confirmed that the water has not been used for this purpose for several years.

#### **WR-A6 Maximum Quantities of Water to be extracted**

The licence sets out the maximum aggregate quantity of water authorised to be abstracted for the purposes of evaporative cooling.

Abstraction returns have been submitted to NRW for the period 1 April 25 - 31st March 26 via the online portal. These are the meter readings for Borehole A.

The total amount abstracted from Borehole A for this period was 4,117m<sup>3</sup>

Abstraction is also taking place from Borehole B. Data provided to NRW indicates that the total abstraction from Borehole B between April 2025 and March 2026 was 13,511 m<sup>3</sup>.

The aggregate quantity of water authorised to be abstracted under this licence for the purposes of evaporative cooling is 110,000 m<sup>3</sup> per year.

The combined total abstracted from boreholes A and B for this period is 17,628 m<sup>3</sup>.

It is understood that no water has been used for evaporative cooling at Synthite for several years.

#### **WR-B1 Means of Measurement of Water abstracted**

Both boreholes A and B have meters to measure the quantities of water abstracted.

A third meter is installed to indicate the amount of groundwater which is used for the evaporative cooling process.

Licence condition 7.1(iv) requires the Licence Holder to "calibrate the meters regularly in accordance with the recommendations of the manufacturer". The calibration certificates were not available at the time of the inspection.

**ACTION 1:** Provide NRW with the dates and evidence of certification of when the meters were last calibrated by 26th August 2026.

#### **WR- D1 Recording - Environmental Monitoring and Recording**

**Permit condition 9.3** states: "Groundwater level measurements shall be taken within abstraction Borehole A... on a weekly basis for the period the licence remains in force"

**Permit Condition 9.6** states : "in addition...groundwater level measurements shall be taken and recorded on a weekly basis in the observation borehole BH5"

The data submitted to NRW for the last 12 months shows that this information has been recorded intermittently. No data was recorded April - September 2025, or mid-November 2025 - mid January 2026.

**ACTION 2:** By 26th August Provide training to all relevant staff to ensure weekly groundwater level monitoring and recording is undertaken in accordance with licence conditions 9.3 and 9.6, and reducing reliance on individual staff members to improve overall resilience within the team.

Borehole BH5 is blocked and groundwater monitoring cannot be carried out as required by the permit. Officers were informed that this had only recently been identified as an issue and is in the process of being rectified.

**ACTION 3:** By 26th August advise NRW of the timescale for making Borehole BH5 operational again.

**The issues identified above demonstrate that the operator is not operating in compliance with permit conditions 9.3 and 9.6. This has resulted in a C3 non-compliance score against WR-D1 above.**

The operator is reminded that the Abstraction Licence expires on 31st March 2027, and is advised to submit a renewal application, if required, in a timely manner.

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 licence is issued to you under the Water Resources Act 1991 as amended by the Water Act 2003. You have a responsibility to comply with the conditions of your licence 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.

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 licence condition assessed to avoid non-compliance. No non-compliance scored at this time |
| 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       |

**Full list of Water resource action criteria** (used in section 1 and 2):**WR A: Abstraction specified by Licence**

- WR-A1 Source of supply
- WR-A2 Points of abstraction
- WR-A3 Means of abstraction
- WR-A4 Purposes of abstraction
- WR-A5 Period of abstraction
- WR-A6 Quantities
- WR-A7 Land
- WR-A8 Other specified on licence

**WR B: Abstraction measurement and records**

- WR-B1 Means of measurement
- WR-B2 Recording
- WR-B3 Reporting

**WR C: Surface / Groundwater level and protected flow**

- WR-C1 Minimum hands-off flow/level requirements
- WR-C2 Flow/level measurement devices
- WR-C3 Recording
- WR-C4 Reporting

**WR D: Environmental monitoring and information**

- WR-D1 Recording
- WR-D2 Reporting
- WR-D3 Notifications

**WR E: Fish and eel passage**

- WR-E1 Infrastructure specified by licence
- WR-E2 Maintenance and records

**WR F: Discharge**

- WR-F1 Point of discharge
- WR-F2 Infrastructure
- WR-F3 Measurement
- WR-F4 Recording
- WR-F5 Reporting

**WR G: Impoundment specified by licence**

- WR-G1 Inland water to be impounded
- WR-G2 Manner and extent of impoundment
- WR-G3 Point(s) of impoundment
- WR-G4 Construction and removal requirements
- WR-G5 Other specified on licence

**WR H: Borehole infrastructure**

- WR-H1 Infrastructure and accessibility
- WR-H2 Maintenance and calibration

## Enforcement response

Any non-compliance with a licence condition is an offence and we may take legal action against you. Action we take can include prosecution or civil sanctions. 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](mailto: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](mailto: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.