

Compliance Assessment Report for: CAR_NRW0048997

Permit number	EPR/BX9471IU	Operator name	Tata Steel UK Limited
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Site name	Trostre Works
Site address	Trostre, Llanelli, Carmarthenshire, SA14 9SD
Type of assessment	Site inspection

Date of assessment	29/07/2025	Time in	10:20	Time out	13:15
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Parts of permit assessed	See Section 4 of this report
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NRW Lead officer	Kirsty Thomas	Accompanied by	Benjamin Taylor
Report sent to – Name and position	Engineering Manager – Compliance, Environmental and Process Safety Departments	Date	09/09/2025

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR1A - Management - General management	C2 Significant	1.1.2
IR4A - Information - Records	C2 Significant	4.1.1(d)(ii)
IR3B - Emission and Monitoring - Emissions of substances not controlled by emission limits	C2 Significant	3.2.3

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

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

2. What action is required?

Compliance Criteria	Action needed	Complete by
IR1A & IR4A	Ref CAR_NRW0048997.1 - TSUK must keep appropriate records in accordance with permit condition 1.1.2 and 4.1.1.	Immediate

Compliance Criteria	Action needed	Complete by
IR3B	Ref CAR_NRW0048997.2 – TSUK to provide a feasibility study of providing appropriate secondary containment (in line with CIRIA 736) for the clarifiers which form part of the sites Effluent Treatment Plant (ETP). This study should also detail potential alternative options (if any) should secondary containment be deemed unfeasible. Findings/conclusions of this study, along with a proposed improvement plan must be submitted to NRW for review. This action is requested alongside the previous action Ref CAR_NRW0046813.1 regarding the initial plans to install a new plastic liner.	28.11.2025
Previous Outstanding Actions - CAR_NRW0046792		
IR3B	Ref CAR_NRW0046792.1 - TSUK to provide evidence (verified analysis) to confirm the assumption that chromium discharge to the flume is trivalent chromium.	Completed
	Ref CAR_NRW0046792.2 - TSUK to provide details relating to the ground “plastic” liner installed at the ETP. The submission should include: date/s of the liner installation: the specification of the liner; details of how the liner panels were welded, details of the liner protection (e.g. geotextile protection fabrics); the extent of the liner deployment (including a drawing); liner/jointing detail around any penetration through the liner (e.g. clarifier concrete support etc.); any engineering reports or construction quality assurance documents.	Completed
	Ref CAR_NRW0046792.3 - TSUK to submit their records of maintenance inspections and integrity checks on the liner system installed at the ETP.	Completed
	Ref CAR_NRW0046792.4 - TSUK to provide a plan/drawing showing the extent of the ETP containment layout, including the subterranean concrete base and confirm in line with the CIRIA 736 containment requirements.	Completed
	Ref CAR_NRW0046792.5 -TSUK to provide details relating to the subterranean concrete base installed at the ETP. The submission should include: date/s of the concrete base installation and any engineering reports or construction quality assurance documents.	Completed
	Ref CAR_NRW0046792.6 - TSUK to submit their records of maintenance inspections and integrity checks on the subterranean concrete base installed at the ETP.	Completed
Previous Outstanding Actions - CAR_NRW0046813		
IR3B	Ref: CAR_NRW0046813.1 - TSUK is to submit their proposal regarding the installation of the new liner (or suitable	28.11.2025 - Extended in

Compliance Criteria	Action needed	Complete by
	alternative options) beneath the clarifiers, including details of its composition, specifications and installation methodology for review.	line with other containment review actions
	Ref: CAR_NRW0046813.2 - TSUK is to update NRW regarding their proposal to increase the frequency of thermal drone surveys following the review by Veolia, with relevant documentation updated with the new frequency. Evidence of proposed frequency and documentation updates to be submitted to NRW.	Completed
	Ref: CAR_NRW0046813.3 - TSUK/Veolia is submit to NRW records detailing any preventative maintenance that has been implemented along the impacted section of the flume (within the ETP).	Completed
	Ref: CAR_NRW0046813.4 - TSUK to provide a feasibility study of providing appropriate secondary containment (in line with CIRIA 736) for the effluent flume. This study should also detail potential alternative options (if any) should secondary containment be deemed unfeasible. Conclusions generated by the study should be sufficiently justified for review by NRW	28.11.2025
	Ref: CAR_NRW0046813.5 - TSUK to submit to NRW a proposal regarding the installation of additional groundwater monitoring boreholes to provide coverage for the ETP area (in addition to potential upstream gradients). Should any constraints impede the installation of these wells, such information should be provided to NRW for consideration.	Completed
	Ref: CAR_NRW0046813.6 - TSUK to provide the results of the three effluent composition samples (taken from the three agreed points in the flume) to NRW following analysis by a suitably accredited laboratory.	Completed

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 prosecutions 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

This Compliance Assessment Report (CAR) records Natural Resources Wales' (NRW) evaluation of the information submitted by Tata Steel UK Limited (TSUK) in relation to the flume leak incident on 6th February 2025 at the Trostre Works. The review has been conducted to assess TSUK's compliance with the actions specified under CAR references CAR_NRW0046792 and CAR_NRW0046813.

This CAR also records NRW Officers findings and observations of a follow up site inspection and site meeting on 29th July 2025.

Site meeting discussions

TSUK representative provided an update on several work streams being progressed to address the actions set following the flume leak incident at site. A summary of the actions progress and confirmation of completed actions to date are as follows:

CAR NRW0046792

Action Ref CAR_NRW0046792.1 - *TSUK to provide evidence (verified analysis) to confirm the assumption that chromium discharge to the flume is trivalent chromium*

Based on their investigation, TSUK have concluded that hexavalent chromium (Chrome 6) was not present in the flume leak.

Two chrome analysers¹ are located within the Effluent Treatment Plant (ETP) with a sample taken every 20 minutes. These are checked and verified every day by the Effluent Plant Operator. If Chrome 6 is detected, an audible alarm sounds and the operator investigates immediately.

A reduction process to reduce Chrome 6 to Chrome 3 using spent pickle liquor is undertaken. Samples are regularly tested using Diphenylcarbazide, a chemical compound used as a reagent in analytical chemistry, particularly for the colorimetric determination of Chrome 6. TSUK verbally confirmed that on the day/week of incident, all results showed no presence of Chrome 6.

Action (CAR NRW0046792.1) complete.

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Action Ref CAR_NRW0046792.2 - *TSUK to provide details relating to the ground "plastic" liner installed at the ETP. The submission should include: date/s of the liner installation; the specification of the liner; details of how the liner panels were welded, details of the liner protection (e.g. geotextile protection fabrics); the extent of the liner deployment (including a drawing); liner/jointing detail around any penetration through the liner (e.g. clarifier concrete support etc.); any engineering reports or construction quality assurance documents.*

Action Ref CAR_NRW0046792.3 - *TSUK to submit their records of maintenance inspections and integrity checks on the liner system installed at the ETP.*

¹ One analyser is located in the upper flume, and the second is located in the basement after the lagoons.

TSUK have confirmed that they have no records of the liner underneath the clarifiers. Therefore, the containment capability of the liner is unknown.

NRW Officers inspected the area underneath the clarifiers and a poor-quality liner material was observed (see further details in site observation section).

Condition 1.1.2 of the sites permit states records demonstrating compliance with condition 1.1.1² shall be maintained. TSUK were unable to provide any records of the “plastic” liner that was claimed at the time of the incident to contain the leaked effluent underneath the clarifiers.

The lack of records (for the liner noted above) is considered a breach of permit condition 1.1.2. A non-compliance score of C2 has been attributed to this permit contravention (against sub-criteria IR1A).

The lack of records (for the liner noted above) is also considered a breach of permit condition 4.1.1(d)(ii)³. A non-compliance score of C2 has been attributed to this permit contravention (against sub-criteria IR4A).

Action Ref CAR_NRW0048997.1 TSUK must keep appropriate records in accordance with permit condition 1.1.2 and 4.1.1.

As no further information on the liner is available, these actions (ref: CAR NRW0046792.2 & CAR NRW0046792.3) will be marked as complete.

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Action Ref CAR_NRW0046792.4 - TSUK to provide a plan/drawing showing the extent of the ETP containment layout, including the subterranean concrete base and confirm in line with the CIRIA 736 containment requirements.

Action Ref CAR_NRW0046792.5 -TSUK to provide details relating to the subterranean concrete base installed at the ETP. The submission should include: date/s of the concrete base installation and any engineering reports or construction quality assurance documents.

Action Ref CAR_NRW0046792.6 - TSUK to submit their records of maintenance inspections and integrity checks on the subterranean concrete base installed at the ETP.

TSUK confirmed that after reviewing the documentation for the area between the main flume and the clarifiers, there is no subterranean concrete base between, or under, the flume and the clarifier – as previously claimed. The effluent flume itself does not have secondary containment (nor does the clarifiers). Therefore, the area where effluent was lost

² Condition 1.1.1 - 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; and

³ All records required to be made by this permit shall: (d) - be retained, unless otherwise agreed in writing by Natural Resources Wales, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender (ii) - matters which affect the condition of the land and groundwater.

from the flume was likely to have lost some effluent to ground and there is a lack of appropriate containment measures in place.

The unauthorised emission of polluting substances from the effluent flume has already been identified as a breach of permit condition 3.2.1 in CAR_NRW0046792.

Therefore, these actions (CAR NRW0046792.4; CAR NRW0046792.5 & CAR NRW0046792.6) have been marked as complete.

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NOTE- TSUK are in the process of completing a secondary containment feasibility study for the flume itself. It is noted that the clarifiers are un-bunded assets and TSUK are also in the process of considering improvement to containment measures to the area underneath the clarifiers, which may be an alternative solution to the implementation of a new plastic liner as per CAR action - **Ref CAR_NRW0046813.1**.

TSUK have shared with NRW that a clay layer (at around 3.5m deep) is believed to be present within the area. It has also been suggest by TSUK (as per their contractor) that as the site is underlain by a clay layer, the risk of vertical migration is very low and therefore as an alternative, a cut-off wall and drain may address effluent leakage from the flume and the clarifiers.

NRW's Geosciences Team have expressed concerns that although the presence of the clay would be beneficial in reducing potential vertical migration, lateral migration of any released effluent within made ground would need to be further explored. If there were to be a leak and effluent pools on top of the clay, the effluent would sit in the made ground above and there would be a requirement to excavate and remove the impacted made ground in event of a leak. As with the current clean-up of contaminated material underneath the clarifiers, this is proving to be an onerous operation and TSUK would need to consider their ability to clean up or remove any impacted made ground in this area.

Any further investigation TSUK wish to make to explore alternative solutions must be robust. Confirmation that the suspected clay layer is both laterally extensive across the whole area would be required and of sufficient thickness to essentially mitigate any vertical migration. NRW reiterates that any further investigation TSUK wish to undertake further is up to TSUK and would need to be comprehensive across the area in question to give sufficient confidence of conclusions made.

Please note, If a leak results in pollution to groundwater (which needs both lateral and vertical migration consideration), this would be considered a groundwater activity and would be an offence under EPR Schedule 22, Groundwater.

ACTION - Ref CAR_NRW0048997.2– TSUK to provide a feasibility study of providing appropriate secondary containment (in line with CIRIA 736) for the clarifiers which form part of the sites Effluent Treatment Plant (ETP). This study should also detail potential alternative options (if any) should secondary containment be deemed unfeasible. Findings/conclusions of this study, along with a proposed improvement plan must be submitted to NRW for review. This action is requested alongside the previous action Ref CAR_NRW0046813.1 regarding the initial plans to install a new plastic liner.

The ongoing use of the effluent flume and clarifiers without appropriate secondary containment in place has been assessed as a non-compliance with permit condition 3.2.3. A non-compliance score of C2 (significant) has been attributed to this permit contravention against sub-criteria IR3B.

We have not considered the compliance implication of other assets that may not have appropriate secondary containment in place at this time. This will be considered as part of a future inspection and on submission of the required information.

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Actions Ref CAR NRW0046792.7-11 were already complete when Compliance Assessment Report CAR NRW0046792 was issued.

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In relation to action **Ref CAR_NRW0046792.10** (clean-up plan for the area contaminated by the effluent leak), NRW confirmed on the 2nd May 2025 that TSUK must proceed with clean-up operations as soon as possible for the contaminated chippings underneath the clarifiers. TSUK must ensure the clean-up operations undertaken do not result in any pollution/harm to the environment, human health or amenities and are carried out by competent personnel and/or contractors (overseen by TSUK). Further discussions were held on the 12th May 2025 to discuss NRW's concerns.

It is acknowledged that clean-up of contaminated soil between the flume and clarifiers is more difficult given the dense pipe network in place. It was agreed as an interim position for the material to be left in situ and additional groundwater monitoring wells will be installed. Ongoing monitoring must be undertaken within surrounding boreholes (see **Action Ref CAR_NRW0046813.5**) to ascertain whether there has been any deterioration of the GW following the February 2025 incident.

TSUK must review monitoring results against baseline data/historic data as a comparison. Details of results/trends in groundwater monitoring over time must be shared with NRW⁴.

A proposal regarding the installation of additional groundwater monitoring boreholes has been provided and NRW provided a response on the 16th May 2025. See **Action Ref CAR_NRW0046813.5 below for further details.**

NRW Officers observed the chipping clean-up operations underway (see further details in site observation section).

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⁴ See further details in NRW's email to TSUK dated 16 May 2025 with borehole locations, monitoring programme and borehole construction expectations.

CAR NRW0046813

Ref CAR_NRW0046813.1 - TSUK is to submit their proposal regarding the installation of the new liner (or suitable alternative options) beneath the clarifiers, including details of its composition, specifications and installation methodology for review.

As detailed in CAR_NRW0046813, TSUK were unable to find specifications for the liner currently in place and outlined their intent to deploy a new liner underneath the clarifiers. TSUK have approached external specialists/contractors to seek advice and quotations of the installation of a new liner. Details of one potential liner is that of a high density polyethylene (HDPE) geomembrane, manufactured with a high quality resin (chemically resistant) sandwiched between a geotextile protection. Layers would need to be sealed around concrete pillars, pipework and other structures. TSUK informed NRW during the visit on the 29th of July 2025 that ensuring the integrity of the sealing around these features would be a difficult undertaking, with approximately 78 columns identified within the area beneath the clarifiers.

A second company has been approached and are undertaking further investigatory work first to further understand the actual risk to the environment. Suggestions have been made that layers of clay are present in the area which suggests low permeability, naturally containing liquids.

TSUK are considering an alternative solution to address the potential effluent leakage from both the flume and clarifiers - to be further discussed – see additional action included in this CAR - Ref CAR_NRW0048997.1.

Action – Extension until 28.11.2025.

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Ref CAR_NRW0046813.2 - TSUK is to update NRW regarding their proposal to increase the frequency of thermal drone surveys following the review by Veolia, with relevant documentation updated with the new frequency. Evidence of proposed frequency and documentation updates to be submitted to NRW.

Veolia are completing weekly visual inspections, along with using a hand held thermal camera as Planned Preventative Maintenance (PPM) work (this will run until end of 2025 and then change to monthly inspections).

TSUK have also proposed to increase the frequency of the thermal drone surveys, presently undertaken annually, to a frequency of three per year. NRW welcomes TSUK plan to increase the thermal drone surveys of the effluent flume.

The drone surveys will continue to be carried out by a third-party specialist. TSUK will be working on the basis that the surveys will be completed on the following times:

- middle to end of Autumn
- middle of Winter
- early to middle of Spring.

The tasks have been added to a PPM programme for Veolia (within their Concept IT system⁵), and it's been added to the SAP system on Tata's side (duplicating the Veolia PPM programme). TSUK must also update any other documentation (e.g. accident and incident management plans) with the updated PPM actions.

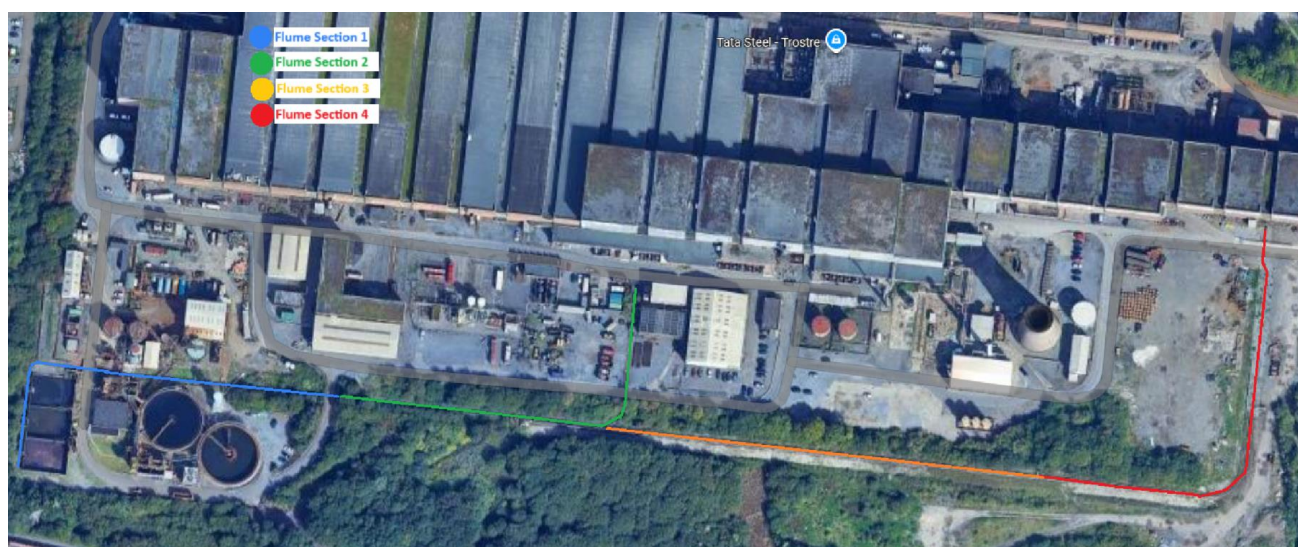
Action CAR NRW0046813.2 - complete.

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Ref CAR_NRW0046813.3 - TSUK/Veolia is submit to NRW records detailing any preventative maintenance that has been implemented along the impacted section of the flume (within the ETP).

TSUK confirmed a new annual inspection program for the flume has been created and is implemented onto the Concept system/SAP system. The new planned preventative maintenance task is an internal inspection of a section of the flume (once dammed and cleaned), to visually check the chemical resistant lining across the walls and base of the flume.

The flume will be divided into four sections, with one section being inspected every year⁶.



The four sections have been shown in the aerial view screenshot of the flume below (marked in red, orange, green and blue).

In summary, TSUK will:

- Undertaken 3 thermal drone surveys every year, undertaken by a third party specialist;
- Veolia will carry out weekly visual inspections of the flume, along with using a hand held thermal camera as PPM work (this will run until end of 2025 and then change to monthly inspections); and

⁵ System used by Veolia to plan/track maintenance plans.

⁶ The flume runs the full length of the South side of the plant, covering over 800 metres. Splitting the work into 4 sections is safe, manageable and reasonable for TSUK – however TSUK must keep this frequency under review. Each section of the flume will have had an internal inspection every 4 years.

- Carry out an annual inspection of the flume, to visually check the chemical resistant lining across the walls and base of the flume. The flume will be divided into four sections, with one section being inspected every year.
- NOTE – TSUK must review the programme regularly in conjunction with NRW and may be subject to changes in inspection frequencies e.g if more deficiencies are identified, an increase inspection frequency may be required.

This is an improvement on previous measures of only monthly visual inspections and a single annual drone survey.

Action CAR NRW0046813.3 complete.

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Ref CAR_NRW0046813.4 - TSUK to provide a feasibility study of providing appropriate secondary containment (in line with CIRIA 736) for the effluent flume. This study should also detail potential alternative options (if any) should secondary containment be deemed unfeasible. Conclusions generated by the study should be sufficiently justified for review by NRW.

In progress – due 28 November 2025.

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Ref CAR_NRW0046813.5 - TSUK to submit to NRW a proposal regarding the installation of additional groundwater monitoring boreholes to provide coverage for the ETP area (in addition to potential upstream gradients). Should any constraints impede the installation of these wells, such information should be provided to NRW for consideration.

A proposal regarding the installation of additional groundwater monitoring boreholes has been provided and NRW provided a response on the 16th May 2025. It was acknowledged that the additional boreholes proposed provided good coverage to the south and west of the ETP and agree these are suitable locations. NRW requested further information regarding the monitoring programme and provided advice and comments regarding borehole construction.

GK Drilling were instructed by TSUK to undertake a groundwater monitoring and borehole condition survey for the existing boreholes at the site⁷. Overall, the survey results confirmed positive recharge results for all boreholes surveyed. Some maintenance of the areas is recommended (e.g. strimming, inclusion of a marker post, top hat covered required etc).

GK Drilling have installed the newly proposed boreholes. The borehole construction and design logs have been shared with NRW⁸. TSUK will commence monthly monitoring of the newly proposed wells as well as the existing wells within the south and west areas of the

⁷ GKD5-1122-GK Drilling July 1st 2025. Trostre Works – Llanelli – Tata Steel. Groundwater Monitoring and Borehole Condition Survey. Survey Date: June 25th 2025.

⁸ NRW Site Officers will seek advice from our Geoscience Team and feedback any comments.

ETP (SPMX, DMBH, LBH4, LBH2, EXT1, NEW1, NEW2)⁹ to undertake reassurance monitoring following the flume leak incident for at the site. Annual groundwater monitoring at other wells on site will be undertaken shortly and all results shared with NRW.

TSUK have committed to undertaken groundwater monitoring for 3 consecutive months initially before returning to annual monitoring. NRW must express that the groundwater monitoring may need to be extended beyond the suggested 3 month period depending on the sample results. TSUK have confirmed that a contractor company will carry out the groundwater sampling on their behalf.

Action CAR NRW0046813.5- Complete

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Ref CAR_NRW0046813.6 - TSUK to provide the results of the three effluent composition samples (taken from the three agreed points in the flume) to NRW following analysis by a suitably accredited laboratory.

Effluent samples taken and results have been submitted to NRW. Results show typical composition of the effluent flume but are only a snap shot.

Action CAR NRW0046813.6 complete.

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Root Cause

TSUK's review of failure¹⁰ concluded that both cracks appeared in flume wall lining underneath pipes with no visual signs or erosion or impact. TSUK believe the cracks formed due to movement of a steel pipe (expanding and contracting) over a long period of time causing the rigid fibreglass lining to distort or crack.

TSUK completed repairs in February by an external contractors. The area of the leak from February will be included in the annual inspection plan and further work is being planned to understand whether some of the pipes that penetrate the flume wall can be re-routed or removed. TSUK have committed to reviewing all areas where pipework protrudes through the flume wall this year.

TSUK provided an update to NRW during the July site inspection meeting. TSUK are reviewing the pipework areas alongside the ongoing flume feasibility study. TSUK must share further findings of this review with NRW in due course.

⁹ DMBH, LBH4, LBH2 boreholes are existing boreholes that are tested annually. SPMX and EXT1 are existing boreholes that have been found recently. NEW1 and NEW2 are newly installed boreholes to the west of the ETP.

¹⁰ Document - *Trostre flume leak - Summary Report - February & March 2025. Provide by TSUK via email 12.05.2025*

Site observations – 29 July 2025

NRW Officers inspected the chipping clean-up process being undertaken¹¹ within the ETP compound. The most contaminated chippings underneath the clarifiers were being targeted first.

NRW Officers can confirm that the chipping clean-up process has progressed but was explained by TSUK that this was taking more time and effort than anticipated. Chippings are being removed manually which is labour intensive and resulted in slow progress. TSUK are considering the use of a Vac-Ex to expedite the removal process.

The process involves the removal of contaminated chippings from underneath the clarifiers and transporting them to the horseshoe bay and washed down. The cleaning process involves the use of water and agitation to remove contamination. The chipping clean-up process is contained within ETP area and runoff routed to effluent flume. TSUK must ensure effluent is appropriately contained and does not cause pollution.

Veolia has also produced a method to test the effectiveness of the clean-up process¹². TSUK confirmed verbally that chippings were regularly tested, and records kept by Veolia. The clean chippings are segregated and stored to allow for them to be reused on the liner underneath the clarifier.

Upon inspection, the liner, now clearly visible beneath the clarifiers, was found to be in poor condition. Numerous tears and holes were evident, and sections of the liner material were unsealed. The material of the liner appeared to be that of a geo-textile membrane, as opposed to a more robust chemically resistant containment plastic liner which was initially described to NRW. Therefore, it is considered there is a lack of containment by appropriate measures and the unauthorised emission of polluting substances had the potential to have a significant impact or effect on the environment, people and or/property (as identified in CAR__NRW004792).

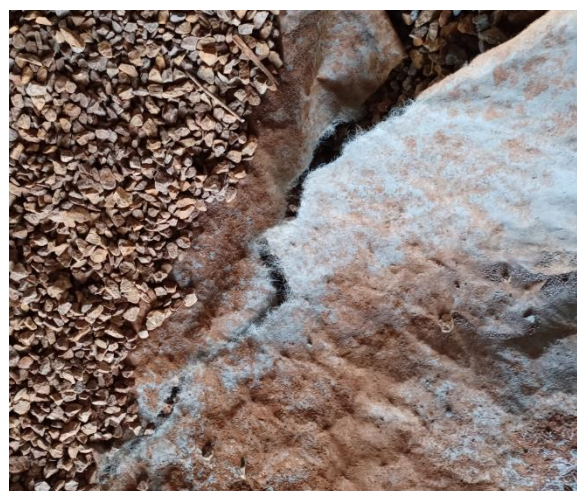


Image 1 & 2 – Liner underneath clarifiers.

¹¹ Clean up being undertaken by Veolia on behalf of TSUK

¹² Veolia - Test results and procedure document.

TSUK are considering their next steps into the liner replacement or alternative solution and will warrant further discussion with NRW.

END

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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
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 and Landfill 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.

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.