

Compliance Assessment Report CAR_NRW0050260

Permit being assessed: EP3830GH.

For: Liberty Steel Newport Ltd, **held by:** Liberty Steel Newport Ltd

At: Corporation Road, Newport, NP19 4XE.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 17/11/2025.

Parts of permit assessed: See comments section.

NRW Lead Officer: David Thomson.

Report sent to: Redacted, Resources and Compliance Manager, on 29/12/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR4C - Installations - Information - Notification	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?

Criteria	Action needed	Complete by
IR4B	Operator to review reporting forms against permitted emission limits and update where necessary e.g., update the ELV for cadmium emissions to water to 0.05mg/l.	28/01/2026

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.

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

Assessment Details

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter NRW) assessment of Liberty Steel Newport Ltd's (hereafter operator) Q3 (July to September) 2025 compliance with the relevant environmental permit conditions for Reporting (section 1.0), Emissions & Monitoring (section 2.0) and Notifications (section 3.0).

1.0 Reporting

The purpose of this section is to record environmental permit condition breaches arising from the incorrect or late reporting of emission monitoring data. Condition 4.2.3 of the environmental permit states:

Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;*
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and*
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.*

Table S4.1 of Schedule 4 (Reporting of monitoring data) to the environmental permit is partially reproduced below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.5.1	A1, A2 and A5	Ranging from 3 to 12 months	/
Emissions to water Parameters as required by condition 3.5.1	W1	Every 3 months	/

Table S4.4 of Schedule 4 (Reporting forms) to the environmental permit is partially reproduced below.

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by Natural Resources Wales	01/04/2016
Water	Form water 1 or other form as agreed in writing by Natural Resources	01/04/2016

Wales

1.1 Compliance Assessment

Point Source Emissions to Air – A1, A2 and A5

1. The reporting form for emissions to air was submitted by the operator via email on 28 October 2025.
2. The reporting form submission was made inside the 28 day reporting window which represents compliance with the environmental permit.
3. The reporting form submitted is for the reporting period specified in Schedule 4 Table S4.1 which represents compliance with the environmental permit.
4. Emissions to air data was not submitted using the form specified in Schedule 4 Table S4.4, however, all information reported in form *Air1 / 13/11/2016* is aligned to the reporting requirements of the environmental permit and therefore represents compliance with the environmental permit.
5. The reporting form submitted included results for all parameters and emission points specified in Schedule 4 Table S4.1 which represents compliance with the environmental permit.

Point Source Emissions to Water – W1

6. The reporting form for emissions to water was submitted by the operator via email on 28 October 2025.
7. The reporting form submission was made inside the 28 day reporting window which represents compliance with the environmental permit.
8. The reporting form submitted is for the reporting period specified in Schedule 4 Table S4.1 which represents compliance with the environmental permit.
9. Emissions to water data was not submitted using the form specified in Schedule 4 Table S4.4, however, all information reported in form *Water1 /15/08/2016* is aligned to the reporting requirements of the environmental permit and therefore represents compliance with the environmental permit. **Note** – The permitted emission limit value for cadmium is 0.05mg/l, however *Water1 /15/08/2016* reporting form states that the ELV for cadmium is 0.006mg/l.
10. The reporting form submitted included results for all parameters and emission points specified in Schedule 4 Table S4.1 which represents compliance with the environmental permit.

Compliance Classification Scheme (CCS): *There are no occurrences of non-compliance with permit condition 4.2.3.*

Action: *Operator to review reporting return forms against permitted emission limits and update where necessary e.g., update the ELV for cadmium in emissions to water to 0.05mg/l.*

1.2 Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

2.0 Emissions and Monitoring

The purpose of this section is to record environmental permit condition breaches arising from the exceedance of permitted emission limits. Condition 3.1.2 of the environmental permit states:

The limits given in schedule 3 shall not be exceeded.

Schedule 3 Table S3.1 (Point source emissions to air – emissions limits and monitoring requirements) is available on pages 12 – 14 of the environmental permit. Schedule 3 Table S3.2 (Point source emissions to water (other than sewer) and land – emission limits and monitoring requirements) is available on pages 14 – 15 of the environmental permit.

2.1 Compliance Assessment

Point Source Emissions to Air – A1, A2 and A5

The activities giving rise to emissions from points A1 and A2 were not in operation and generated no emissions

to air during the reporting period (Q3 2025). The process giving rise to emissions from point A5 was idled and generated no emissions to air during the reporting period (Q3 2025). The report therefore contains no emissions monitoring results for emission points A1, A2 and A5 which represents compliance with the environmental permit.

Point Source Emissions to Water – W1

Emissions monitoring data submitted by the operator on 28 October 2025 demonstrates that all measured parameter results were within the permitted emission limits which represents compliance with the environmental permit. **Note** – the operator informed NRW that the dry summer weather had affected attempts to attain water samples on a monthly frequency as there was no visible water discharge during the months of July and August. Consequently, the W1 reporting form contains analysis results from September only.

Compliance Classification Scheme (CCS): *There are no occurrences of non-compliance with permit condition 3.1.2*

Action: *no action required*

3.0 Notification

The purpose of this section is to record environmental permit condition breaches arising from the late notification of any condition breach to NRW. Condition 4.3.2 (b)(i) of the environmental permit states:

*(b) in the event of a breach of any permit condition the operator must immediately
(i) inform Natural Resources Wales*

Furthermore, condition 4.3.3 of the environmental permit states:

Any information provided under condition 4.3.2(a)(i) or 4.3.2(b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

3.1 Compliance Assessment

The operator has not breached any permit conditions which represents compliance with the environmental permit.

Compliance Classification Scheme: *There are no occurrences of non-compliance with permit conditions 4.3.2(b)(i) and 4.3.3.*

Action: *no action required*

3.2 Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required

[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
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 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 – Emissions to water, air or 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 to 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.