

## Compliance Assessment Report CAR\_NRW0050903

<b>Permit number</b>	BS3905IP	<b>Operator name</b>	Tata Steel UK Limited
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<b>Site name</b>	Tata Steel UK Limited
<b>Site address</b>	TATA Steel Strip Products UK, Llanwern Works, Newport, NP19 4QZ
<b>Assessment type</b>	Check Monitoring/Sampling

<b>Date of assessment</b>	27 February 2026	<b>Time in</b>	N/A	<b>Time out</b>	N/A
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<b>Parts of permit assessed</b>	See Part 4
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<b>NRW Lead officer</b>	Guy Baskerville	<b>Accompanied by</b>	N/A
<b>Report sent to – Name and position</b>	[REDACTED] Fire & Environment Manager	<b>Date</b>	02 March 2026

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

Part of permitted activity assessed 1B(use action criteria below)	Assessment result	Permit condition
IR3A(1) - Emissions and Monitoring - Emissions to Water	C3 Minor	6.3.2
IR4C - Information - Notification	Assessed or assessed in part (A)	5.1.1 5.1.2

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

Total number of non-compliances recorded	Total non-compliance score
1	4

### 2. What action is required?

Criteria	Action needed	Complete by
N/A	N/A	N/A

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.

#### 4. Details of our assessment

The purpose of this Compliance Assessment Report (CAR) is to record breaches of the environmental permit arising from the exceedance of permitted emission limits during Q4 2025.

Condition 6.3.2 of the environmental permit states:

*Limits for the emissions to water for the parameter(s) and emission point(s) set out in Table 6.3.3 shall not be exceeded.*

Table 6.3.3 of the environmental permit is reproduced below.

Table 6.3.3: Emission limits into water		
Parameter	Emission Point W1	Monitoring frequency
Flow rate	28000 m <sup>3</sup> /day (dry weather)	Continuous
pH min	6	
pH max	12	
Total hydrocarbon oil <sup>(3)</sup>	5 mg/l	Weekly average
Suspended solids <sup>(1)(2)(3)</sup>	100 mg/l	
Dissolved iron <sup>(1)(3)</sup>	10 mg/l	
Total chromium <sup>(1)(3)</sup>	0.2 mg/l	
Dissolved nickel <sup>(1)(3)</sup>	0.2 mg/l	
Zinc <sup>(1)(3)</sup>	2 mg/l	
Copper <sup>(1)(3)</sup>	0.1 mg/l	
Lead <sup>(1)(3)</sup>	0.8 mg/l	
Cadmium <sup>(1)(3)</sup>	0.05 mg/l	
Mercury <sup>(1)(3)</sup>	0.05 mg/l	

<sup>1</sup> Any representative spot sample.

<sup>2</sup> The solids shall be separated and dried at 105 C.

<sup>3</sup> Limit shall be complied with if 95% of all weekly representative spot samples during a rolling half year period do not exceed the limit value given in Table 6.3.3 and the peak spot sample value does not exceed 1.5 times the limit value.

A Schedule 1 Part A Notification was submitted via email on 06 October 2025 reporting that a spot sample total hydrocarbon oil measurement at emission point W1 on 01 October was 10.8mg/l.

This is an exceedance of permitted emission limits and represents non-compliance with the environmental permit. It is noteworthy that the weekly average total hydrocarbon oil measurement did not exceed the permitted emission limit.

**As a result of this non-compliance a CCS Score [C3] has been recorded against compliance sub-criteria IR3A(1) - Emissions to water**

A C3 score has been levied as it is reasonably foreseeable that the exceedance of permitted total hydrocarbon oil emission limit will result in a minor pollution of the environment.

*Action 1: Undertake measures to prevent reoccurrence of the exceedance and/or measures to rectify, limit or prevent any pollution of the environment, as identified by the investigation and presented in the Part B Notification.*

Condition 5.1.1 of the environmental permit states:

*The operator shall notify the Agency [sic] without delay of:*

*(a) the detection of an emission of any substance which exceeds any limit or criteria in this permit specified in relation to the substance*

Condition 5.1.2 of the environmental permit states:

*The Operator shall submit written confirmation to the Agency [sic] of any notification under condition 5.1.1 in accordance with Schedule 1 to this permit by sending the information listed in Part A of Schedule 1 to this Permit within 24 hours of such notification. The Operator shall send the more detailed information listed in Part B of that Schedule as soon as practicable thereafter. .*

The operator notified the regulator of the exceedance of permitted total hydrocarbon oil emission limit(s) on 06 October 2025, which represents compliance with the environmental permit. Written confirmation in accordance with Part A of Schedule 1 to the permit was received by NRW via email at the time of notification.

A notification in accordance with Part B of Schedule 1 to the permit was received by NRW via email on 07 November 2025. The operators investigation into the root cause of the exceedance of permitted total hydrocarbon oil emission limit was inconclusive.

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[END]

## 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):

9B Assessment result	10B 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

11B Non-compliance category	12B 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

### 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.

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](mailto: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](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.