

Compliance Assessment Report CAR_NRW0051300

Permit being assessed: BR97151B.

For: Newport Chemical Complex, **held by:** Solutia UK Ltd

At: Corporation Road , Newport, South Wales, NP19 4XF.

Type of assessment: Site Inspection,

Reason: Routine.

On: 25/02/2026 between 09:30 and 15:30.

Parts of permit assessed: See Section 4 - Details of our assessment.

NRW Lead Officer: Luke Burton.

Report sent to: [REDACTED], Energy and Environment Specialist, on 31/03/2026.

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	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	

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
IR1A	See Comments - IR1A 1 Condition Assessment	31/03/2027
IR1A	See comments - IR1A 2 Remaining Lifespan Determination	31/03/2027
IR1A	See Comments - IR1A 3 Replacement or Improvement Requirement	31/03/2027

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

Introduction

This Compliance Assessment Report (CAR) has been prepared following two announced inspections undertaken at the installation. The purpose of these inspections was to enable the operator to demonstrate the progress made in addressing the actions identified in the previous CAR.

The second inspection was conducted concurrently with an intervention by the Control of Major Accident Hazards (COMAH) Competent Authority (CA). The findings of the CA's intervention are recorded and reported separately and do not form part of this CAR.

This CAR sets out the observations, compliance assessments, and regulatory determinations made solely in relation to the Operator's duties under the Environmental Permitting (England and Wales) Regulations 2016, as amended. No part of this report should be construed as recording, interpreting, or commenting upon matters falling under any other legislative regime.

Regulatory context

On 16 November 2023, a loss of containment occurred due to a failure within the below-ground effluent treatment plant pipeline, resulting in the release of effluent to the surrounding environment at Traston Meadows, Newport.

This incident is fully documented in Compliance Assessment Report (CAR) reference CAR_NRW0042994. In that CAR, the operator was required to complete the following actions in response to the incident:

(IR3E) Monitoring - Quarterly water monitoring and analysis of nearby reens to confirm efficacy of remediation and containment – Due by 31/01/2025.

(IR1A) General Management – 1. Operator to assess integrity of remainder of pipeline. 2. Prepare options appraisal and share with NRW. Inform NRW of proposed course of action by due date – Due by 31/12/2024.

The deadlines for the above actions were subsequently extended to allow the Operator sufficient opportunity to complete the required number of monitoring rounds and undertake further integrity assessments.

The validation environmental sampling report produced by the Operator's consultant in fulfilment of action IR3E was submitted to NRW on 08 April 2025.

The Operator met with NRW virtually on 10 March 2025 to provide summary progress updates on the completion of action IR1A.

During an inspection on 09 October 2025, the Operator provided a further detailed progress update on IR1A .

During an inspection on 25 February 2026, the Operator provided an additional detailed progress update regarding the steps taken to complete action IR1A.

Assessment Action IR3E

The Operator has demonstrated that the programme of quarterly water monitoring and analysis of the adjacent reens, undertaken to assess the efficacy of the implemented remediation and containment measures, has been completed as required.

All monitoring activities scheduled for completion were reported as fulfilled. Supporting data has been submitted, and no outstanding actions have been identified at this stage.

Action IR1A can therefore be closed as complete.

Assessment Action IR1A

In summary, the following steps toward the overarching IR1A action have been completed by the Operator, to date:

-The mechanism of failure believed to have led to the November 2023 incident has been identified.

-An assessment of the integrity of specific points of the pipeline has been undertaken and the outcomes documented.

-An initial optioneering exercise for replacement or enhancement options for the pipeline has been undertaken.

Action IR1A therefore remains open and due dates extended, in the following amended format:

IR1A 1 — Condition Assessment

The Operator must undertake and document a comprehensive assessment of the condition of the effluent treatment plant discharge pipeline, including all below-ground and above-ground sections, for the purpose of determining its current capability to perform its intended function without loss of containment. The assessment must be carried out using an appropriate recognised methodology and completed by a competent person. The findings must be recorded and retained. Action due date: 31/03/27.

IR1A 2 — Remaining Lifespan Determination

The Operator must determine, justify, and document the estimated remaining operational lifespan of the effluent treatment plant discharge pipeline, based on the findings of the assessment completed under IR1A 1. The assessment must include the likelihood and potential consequences of structural degradation, corrosion, or failure, and must state the

date by which the pipeline will no longer be capable of reliably performing its intended function. Action due date: 31/03/27.

IR1A 3 — Replacement or Improvement Requirement

Where the assessment completed under IR1A 1 or the lifespan determination completed under IR1A 2 indicates, or gives reasonable grounds to believe, that the effluent treatment plant discharge pipeline is not, or will not remain, capable of performing its intended function without risk of loss of containment, the Operator must design, plan, and implement the necessary replacement or improvement works. All such works must be fully completed before the end of the lifespan identified under IR1A 2. Evidence of completion must be documented and retained. Action due date: 31/03/27.

For the avoidance of doubt, the date of 31 March 2027 assigned to IR1A 3 — Replacement or Improvement Requirement shall not be construed as the final deadline for completion of the replacement or improvement works. This date has been set solely as a review point for assessing progress and determining the appropriate next steps.

The actual deadline for completion of the actions required under IR1A 3 shall be established following the outcome of IR1A 2 — Remaining Lifespan Determination. Upon completion of IR1A 2, NRW will specify the definitive timescale for compliance with IR1A 3, taking into account the assessed remaining lifespan and any associated risk considerations.

Further points

The operator has provided a summary of the operational changes implemented and the options currently being explored to minimise mechanical stress and pressure within the pipeline system, together with the routine maintenance and leak-detection activities undertaken.

These matters do not form part of the compliance assessment set out in this report. They will instead be considered as part of future regulatory compliance activities undertaken by 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
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.