

Compliance Assessment Report CAR_NRW0051946

Permit being assessed: BL7108IM.

For: Port Talbot Steel Works , **held by:** Tata Steel UK Limited

At: Tata Steel Strip Products UK , PORT TALBOT, PORT
TALBOT, WEST GLAMORGAN, SA13 2NG.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 18/05/2026.

Parts of permit assessed: See Section 4.

NRW Lead Officer: Benjamin Taylor, accompanied by Kirsty Thomas, Rhodri Morgan.

Report sent to: Head of Environment, HSE Systems & Governance, Tata Steel (UK) Ltd, on 21/05/2026.

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 | C3 Minor | Permit condition 1.1.1 |

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

| Total non-compliances recorded | Total non-compliance score |
|--------------------------------|----------------------------|
| 1 | 4 |

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 | TSUK is required to submit the information requested in the above actions by the specified deadline. | 12/06/2026 |

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.

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

Introduction

This Compliance Assessment Report (CAR) relates to TSUK's repeated failure to comply with actions issued by Natural Resources Wales (NRW). These actions are regarding the Port Talbot Steelworks, which is operated by Tata Steel UK Ltd (TSUK) under environmental permit EPR/BL7108IM.

Scope

The following CARs including their associated actions have been reviewed as part of this CAR form:

- **CAR_NRW0049610**
- **CAR_NRW0049869**
 - *CAR_NRW0049869.A6*
- **CAR_NRW0050734**
 - *CAR_NRW0050734.A1*
 - *CAR_NRW0050734.A2*
 - *CAR_NRW0050734.A3*
 - *CAR_NRW0050734.A4*
 - *CAR_NRW0050734.A5*
 - *CAR_NRW0050734.A6*
 - *CAR_NRW0050734.A7*
 - *CAR_NRW0050734.A8*
- **CAR_NRW0050735**
 - *Action 50735/01*

Overview of Overdue CAR Actions

Following review of outstanding CAR actions, NRW has identified that that the following actions are incomplete and subsequently are overdue:

CAR_NRW0049610 - due the 31st of October 2025 (partially completed, awaiting further clarification as per email issued by NRW on the 1st of May 2026, details from this email are

extracted below for convenience).

- HMS
 - Clarify where in the heavy end the 35kt stockpile of “conditioned” sludge is located.
 - Please explain the conditioning process undertaken on the hot mill sludge. What is happening, why is conditioning needed, how long is the conditioning process etc.
 - Appreciate further HMS treatment/disposal options are being considered.
- OMS/Prime mill scale
 - Thank you for confirming that mill scale is sent off site to an external recycling company - Roy Hatfield in Briton Ferry, and for providing the associated Waste Transfer Note (WTN). It is our understanding that the mill scale is subsequently transferred to a third party for onward management. Please could you therefore clarify the final destination of the mill scale and provide the relevant duty of care documentation for the receiving facility.

[CAR_NRW0049610](#) - due the 30th of January 2026

- TSUK is to provide an update to NRW following technical assessments of submitted formal quotes relating to the 19 identified unbundled assets.

[CAR_NRW0049869.A6](#) – due the 6th of February 2026

- TSUK is to commission a review of their secondary containment measures associated with vessels within the Million Gallon Tank works area (and others as identified by TSUK). This review is to be undertaken by a suitably competent person, with a report generated that will be submitted to NRW as evidence. The report must clearly identify containment deficiencies and include a detailed improvement plan to address the issues.

[CAR_NRW0050734.A1](#) – due the 17th of April 2026

- TSUK is to confirm to NRW whether the remedial works on Middle Outer Crane (AA146) have been completed. If these works have not yet progressed, TSUK must provide an update outlining when the works are scheduled to be undertaken.

[CAR_NRW0050734.A2](#) – due the 22nd of April 2026

- TSUK is to provide an update on the progress with works associated with [CAR_NRW0049869.A4](#). Whilst the requirements of the referenced action ([CAR_NRW0049869.A4](#)) have been met, NRW understands that these measures were intended to be a temporary solution. TSUK had committed to implementing a more permanent solution in the longer term, specifically, the diversion of contaminated rainwater to the oil separator within the Latex bund. NRW is currently unclear on the progress of this bit of work.

CAR_NRW0050734.A3 – due the 22nd of April 2026

- In addition to providing an updated copy of the procedure for processing waste oil at the MGT, TSUK must provide a copy the environmental risk assessment for the OPF activities including details of any associated mitigation measures.

CAR_NRW0050734.A4 – due the 27th of April 2026

- TSUK is to submit the report detailing the conclusions of the works actioned by **CAR_NRW0049869.A6** by the specified deadline. If these works have not yet progressed, TSUK must provide an update outlining when they are scheduled to be completed

CAR_NRW0050734.A5 – due the 1st of May 2026

- TSUK should investigate whether there is a risk of contaminants leaving the curtilage of the earth bund associated with the North/South Tank in the event of a catastrophic failure. Once completed, the conclusion is to be submitted to NRW as evidence.

CAR_NRW0050734.A6 - due the 17th of April 2026

- TSUK must ensure, if they have not already done so, that the outlet gully associated with the Latex Bund is flowing freely. TSUK is also required to confirm the connectivity of this drainage feature before commissioning any works to divert surface water from PC1/PC2. This information must be submitted to NRW as evidence.

CAR_NRW0050734.A7 – due the 15th of May 2026

- In addition to **CAR_NRW0050734.A3**, TSUK must undertake a review of its management systems within the Oil Processing Facility to ensure that drainage infrastructure remains free-flowing at all times, thereby preventing any risk of surface flooding involving potentially contaminated water.

CAR_NRW0050734.A8 - due the 17th of April 2026

- TSUK is required to provide NRW with an update concerning the alleged malfunction of the high-level alarm system associated with the Latex Tank within the Oil Processing Facility.

Action 50735/01 - due the 27th of March 2026

- TSUK to provide evidence that the new weather warning review and sump diversion procedure has been implemented. This should include the written procedure and any documented instances of its application.

Compliance:

During a previous site inspection on the 22nd of August 2025, NRW advised TSUK that deadlines specified within future CARs must be met, and that failure to do so without sufficient explanation

would constitute a non-compliance with permit condition 1.1.1.

Despite this being included as an agenda item during the August 2025 site visit, TSUK has continued to fail in meeting actions set out in subsequent CARs. This is now considered a breach of permit condition 1.1.1, and a noncompliance score of C3 has been allocated under compliance criterion IRA1 – General Management.

Action:

TSUK is required to submit the information requested in the above actions by the specified deadline.

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.