

Compliance Assessment Report CAR_NRW0052177

Permit being assessed: TP3639BH.

For: Tremorfa Melt Shop, **held by:** 7 Steel Manufacturing (UK) Limited

At: Seawall Road, Tremorfa, Cardiff, Cardiff, CF24 5TH.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 23/06/2026.

Parts of permit assessed: 1.1.

NRW Lead Officer: Dale Padfield.

Report sent to: ~, Environmental Manager , on 23/06/2026.

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	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?

No action required.

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

7Steel Manufacturing Ltd

EPR/TP3639BH

This compliance assessment report (CAR) details the light touch review of the operators Climate Change Risk Assessment (CCRA).

The Climate Change Risk Assessment (CCRA) for 7 Steel Manufacturing (UK) Ltd represents a well-developed and credible assessment that broadly meets the expectations for this regulatory light-touch review. The document is clearly structured, logically presented, and demonstrates a strong understanding of both the operational context of the site and the relevant climate-related risks affecting the metals manufacturing sector. It is explicitly site-specific, providing a detailed breakdown of the permitted installations and associated activities across the Rod and Bar Mill, Section Mill and Melt Shop operations. This level of detail provides confidence that the assessment has been grounded in the realities of the site rather than relying on generic assumptions.

A notable strength of the CCRA is the quality and depth of its evidence base. The assessment draws on a wide range of recognised guidance and datasets, including UKCP18 projections, IPCC climate scenarios (RCPs and SSPs), and Met Office climate data. This ensures that the risks have been considered within a robust and credible scientific framework. The use of clearly defined scenarios, current conditions, a 2°C warming scenario for 2050, and a 4°C scenario for 2100, demonstrates that the assessment appropriately considers short-, medium- and long-term timescales. Furthermore, the inclusion of multiple climate variables (temperature, precipitation, sea level rise, wind, lightning and groundwater) provides a comprehensive picture of potential climate stressors affecting the site.

The methodology applied within the assessment is another key strength. The use of a structured, step-by-step risk assessment process, supported by consequence and likelihood matrices, aligns with recognised best practice and is consistent with ISO 14090/14091 principles. The identification of receptors, including site assets, personnel, surrounding infrastructure, and environmental features, demonstrates a broad and integrated understanding of exposure pathways. In addition, the consideration of sector-specific risks and Natural Hazard Triggered Technological Accidents (Natech) reflects an appropriate awareness of the regulatory and operational risks associated with COMAH facilities.

The assessment also successfully identifies the key climate risks facing the site. In particular, it clearly recognises tidal flooding as the most significant long-term risk, supported by evidence that climate change is likely to increase both the extent and severity of flooding across the site. Other relevant risks identified include reduced cooling efficiency during high temperatures, increased storm and lightning impacts, water availability pressures, and potential supply chain disruption. These findings are consistent with expectations for the sector.

The inclusion of a Climate Adaptation Plan (CAP) is a positive feature and demonstrates that the operator has begun to consider how identified risks may be managed. The proposed actions—such as

development of a flood plan, integration with business continuity planning, review of maintenance regimes, and consideration of climate risks in equipment selection are practical and aligned with existing ISO 14001 environmental management framework. The emphasis on integration into existing processes and continuous improvement is appropriate and reflects good environmental management practice.

However, while the CCRA is strong at the assessment stage, the adaptation component remains relatively high-level. The actions presented within the CAP are largely procedural and broadly applicable, rather than being tightly targeted at the highest risks identified. For example, although tidal flood risk is clearly identified as the most significant threat to site operations, the adaptation measures do not yet demonstrate a detailed or prioritised strategy to address this risk through specific engineering, operational or resilience interventions. Similarly, the absence of defined key performance indicators (KPIs) limits the ability to track progress or demonstrate the effectiveness of adaptation measures over time. There is also no clearly defined review cycle or trigger mechanism for updating the assessment in response to new data or changing risk profiles, beyond general references to continuous improvement.

In conclusion, the CCRA is considered robust, proportionate and fit for purpose at this stage, providing a strong foundation for understanding climate risks at the site. It demonstrates good practice in terms of site specificity, use of evidence, and methodological approach, and is consistent with current regulatory guidance. Notwithstanding this, it is expected that further work will be undertaken through the ongoing development of the Climate Change Adaptation Plan, which NRW will be requesting from all EPR installations in due course. Future iterations should seek to refine and prioritise adaptation measures in line with the highest risks identified, incorporate measurable performance indicators, and provide greater detail on implementation and review. This will ensure that the site's response to climate change risks is not only well understood but also demonstrably effective.

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.