



It's everyone's water

Improving our Environmental Performance

Six-monthly report May 2026*

*This report covers progress made against Ofwat's Enforcement Order and our delivery plan up to 31 March 2026.



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Introduction

In November 2021 Ofwat and the Environment Agency announced investigations into all water and wastewater companies in England and Wales on how they manage their sewage treatment works. Throughout the investigation we have fully co-operated with Ofwat's requests for information and have already taken steps to address the issues that we and our regulators have identified. We have a clear plan of action with significant investment over this AMP (2025-2030) and future AMP periods to deliver the improvements necessary to protect the environment and deliver for our customers. The plan will continue to evolve as we agree and review our commitments with Ofwat, and we will publish updates at six-monthly intervals. This second report sets out the progress we have made since submitting our plans in November 2025.

Our Plan addresses the six requirements of Ofwat's Enforcement Order



Requirement 1: Securing compliance: Sufficient capacity and performance at wastewater treatment works.



Requirement 2: Securing compliance: Sufficient capacity and performance of wastewater network assets.



Requirement 3: Securing compliance: Minimising environmental harm from untreated wastewater discharges.



Requirement 4: Oversight of compliance.



Requirement 5: Delivery of the plans.



Requirement 6: Reporting.



Key Deliverables

Enforcement Order Requirement	Overview	Reference	Timelines
<p>1. Securing compliance: Sufficient capacity and performance at wastewater treatment works.</p>	<p>Demonstrate WWTWs are designed, constructed, operated and maintained to receive and treat the volumes of wastewater and storm sewage under normal conditions.</p> <p>Ensure relevant assets have appropriate flow-to-full-treatment ('FFT') / pass-forward flow ('PFF') rates and storage capacity to minimise pollution.</p>	<p>WWTW Remediation Plan</p>	<p>These plans were developed and submitted to Ofwat on 28 November 2025</p>
<p>2. Securing compliance: Sufficient capacity and performance of wastewater network assets.</p>	<p>Demonstrate that all wastewater network assets are designed, constructed, operated and maintained to transport sewage and storm flows to treatment works under normal conditions.</p> <p>Ensure network assets have appropriate PFF capacity and storage levels to convey expected volumes.</p>	<p>Network Remediation Plan</p>	
<p>3. Securing compliance: Minimising environmental harm from untreated wastewater discharges.</p>	<p>Ensure any discharges of untreated wastewater occur only in exceptional circumstances or when no cost-beneficial solution exists to prevent them, thereby avoiding environmental harm.</p> <p>Investigate and take prompt action to remediate high-spilling storm and emergency overflows not already addressed by other plans.</p>	<p>Overflow Plan</p>	

Key Deliverables continued...

Enforcement Order Requirement	Overview	Reference	Timelines	
4. Oversight of compliance.	<ul style="list-style-type: none"> Put in place processes for senior management and Board to regularly review and challenge TW's compliance with environmental permits, UWWTR, and WIA91 obligations. Develop and Implement a programme of training of operational staff and senior management. Ensure leadership receives all necessary compliance information to monitor performance and plan for long-term catchment needs. 	<p style="text-align: center;">Management Plan</p>	<p>This plan was developed and submitted to Ofwat on 28 November 2025.</p>	
5. Delivery of the plans.	<ul style="list-style-type: none"> Comply with all obligations and deadlines in the WWTW Remediation, Network Remediation, Overflow, and Management plans. Any changes to plans must be notified to Ofwat in writing. 		<p><i>N/A (implementation of above plans)</i></p>	<p>Ongoing (per plan target dates).</p>
6. Reporting.	<ul style="list-style-type: none"> Provide Ofwat with progress reports on a six-monthly basis detailing compliance with this Order. Publish on the TW website a summary of progress and actions taken, aligned with the six-monthly reporting cycle. 		<p>Six-monthly progress reports</p>	<p>28 May 2026 (second report; then every 6 months).</p>



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Delivery Plan

Update on Capital Programme

May 2026



Key Capital Schemes

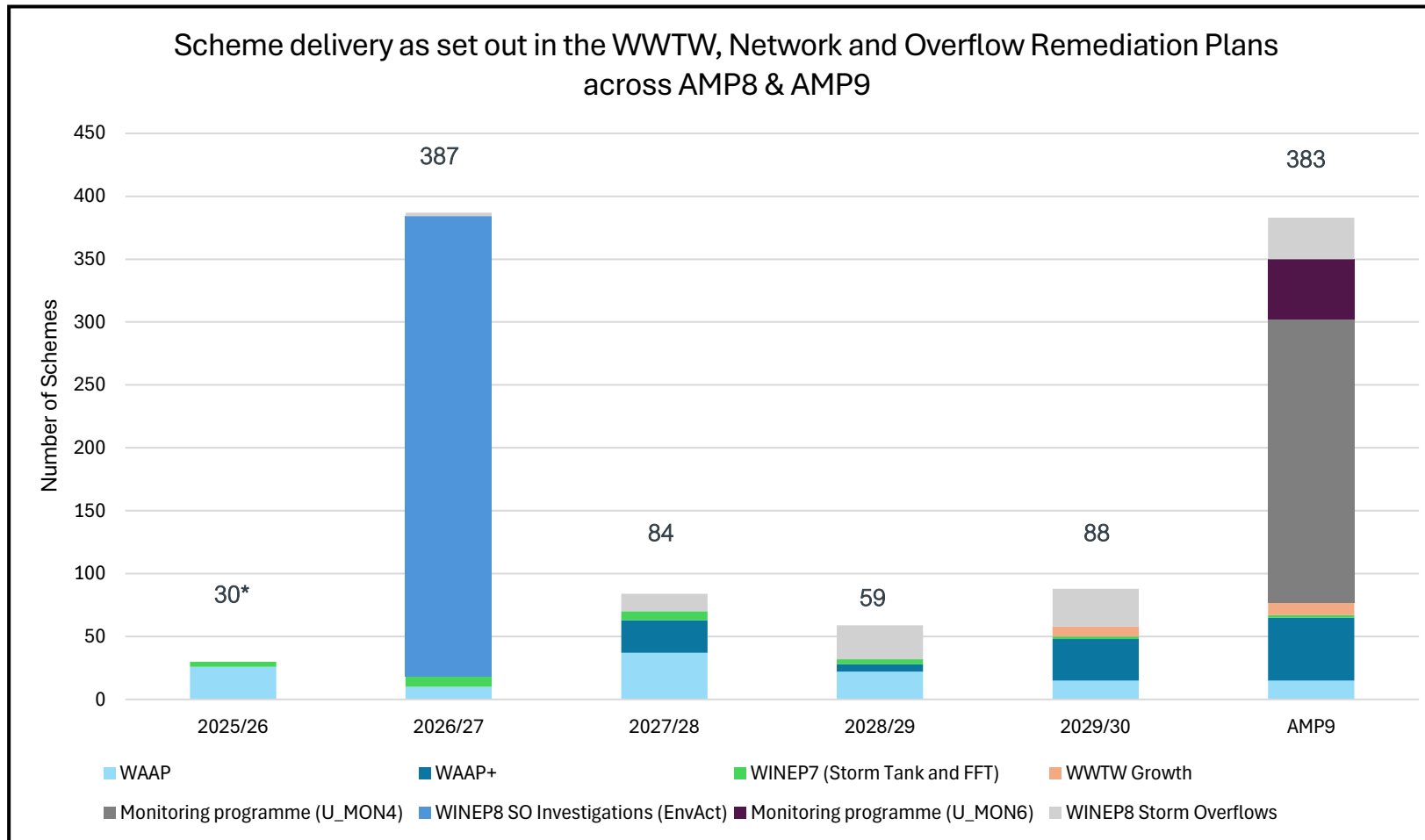
Capital Scheme	Description
WAAP	Interventions delivered under the Wastewater Asset Assurance Programme to address compliance risk with environmental permits.
WAAP+	Interventions delivering WAAP-related improvements on sites additional to the original WAAP plan / scope.
WINEP7 FFT	Flow to Full Treatment enhancements delivered under the Water Industry National Environment Programme agreed in AMP7.
WINEP7 ST	Storm Tank enhancements delivered under the Water Industry National Environment Programme agreed in AMP7.
WWTW Growth	Enhancements delivered to support estimated future growth on WWTW assets.
Monitoring (U_MON4)	Monitoring Flow to Full Treatment at WWTW assets.
Monitoring (U_MON6)	Monitoring Flow from Emergency Overflows.
WINEP8 SO investigations	Investigations for Overflow assets that exist within the WWTW and Network Asset bases.
WINEP8 Storm Overflows	AMP8 component of Storm Overflow Discharge Reduction Programme ('SODRP') interventions delivered under the Water Industry National Environment Programme agreed in PR24.



Our Capital Programme

There are a total of 510 deliverables within the WWTW and network remediation plans across AMP8 and AMP9 and a further 521 schemes in the overflow plan. A summary of the delivery plan is outlined below.

The majority of remedial action in our plans requires the delivery of capital schemes.



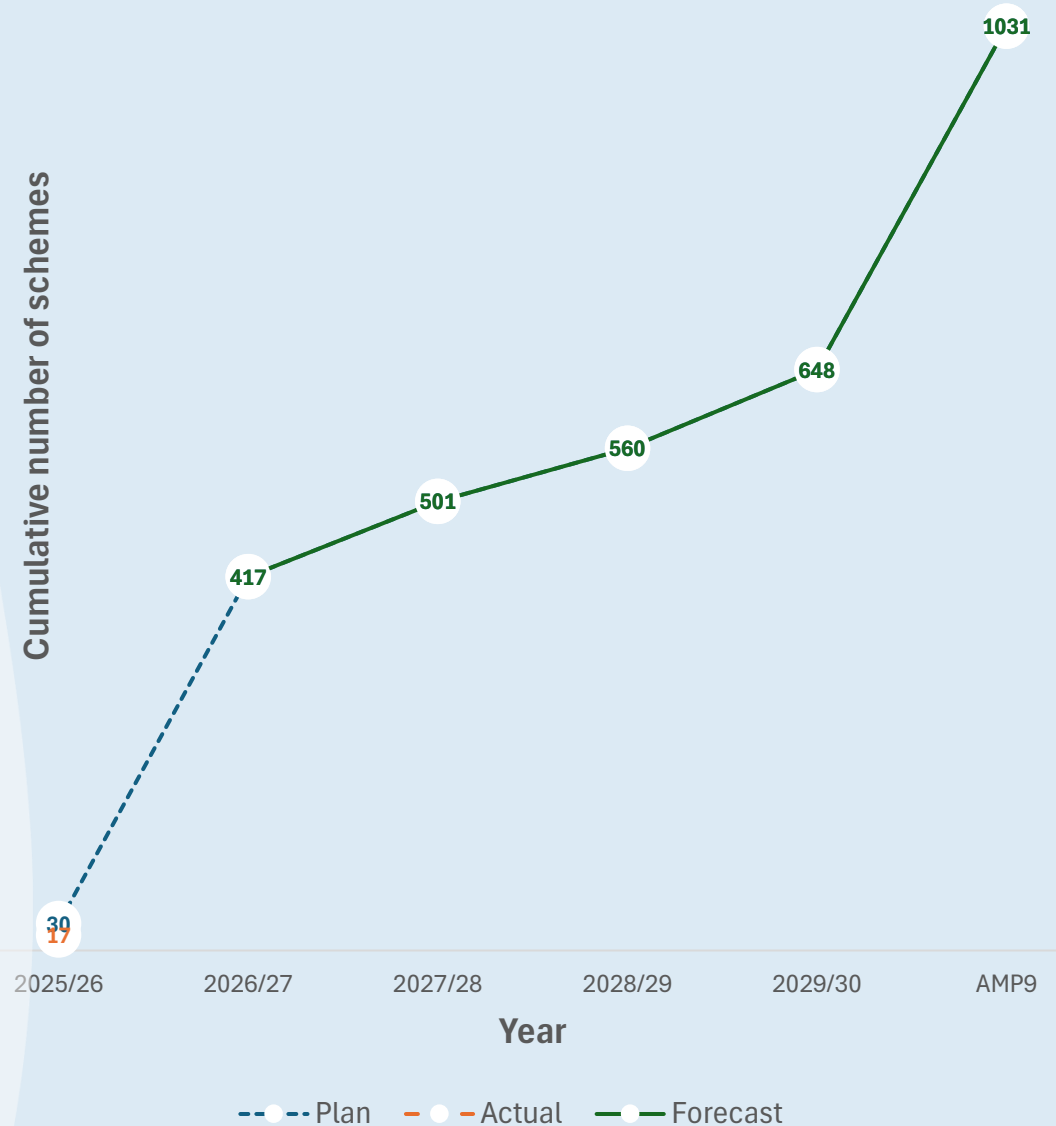
* There were an additional 9 projects delivered in AMP7

Progress against our capital project deliverables

We will report against our plan every six months.

- Our Remediation Plans contain a site-by-site breakdown of assets requiring remedial action with delivery dates for resolution across WWTW and Network sites along with a plan to reduce the frequency of storm overflows.
- So far, we have delivered 22 out of 39 (includes 9 from AMP7) projects that were due to be delivered on or before 31 March 2026.
- To partially mitigate project delays we have also delivered four projects earlier than expected.
- We have also developed a plan which targets recovery by the end of year 2.
- Any delays to projects are closely monitored and we are in the process of embedding a robust change management process. We also look at opportunities to bring projects forward from future years.
- We expect the plans to evolve over time as future interventions may be required to meet our legal and regulatory requirements.

PROGRESS AGAINST SCHEME DELIVERY





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Delivery Plan

Asset Requirements

May 2026



Asset Requirements

As part of the Enforcement Order, we will continually assess our assets against the requirements as set out below with specific triggers that may require further investigation and potential future remediation.

	1 WWTW Remediation Plan		2 Network Remediation Plan		3 Overflow Plan	
	Detailed delivery plan	High-level solution details	Detailed delivery plan	High-level solution details	Detailed delivery plan	High-level solution details
Enforcement order response requirements	Descriptive permit conditions	Small sites with no flow measurement	Descriptive permit conditions	Pass Forward Flow (PFF)	Temp deemed consent conversion to full permit	>20 spills in 12 months
	Temp deemed consent conversion to full permit	Total Daily Volume (TDV) – Max flow to DWF consent conversion	Temp deemed consent conversion to full permit	Emergency overflows acting as storm overflow	<u>uCSOs</u> – Identify and permit	Pollutions Cat 1-3 (root cause UWWTR / s.94 of WIA91 N-C)
	All returns after storm split and FFT monitoring	DWF – Total Daily Volume (Q80)	<u>uCSOs</u> – Identify and permit	Storm Tank size (68 l/h or 2hrs storage)		Dry Day Spills
	Storm tanks emptied As Soon as Reasonably Possible	FFT [3PG + I _{max} + 3E]	Storm Tank size (permit value)	20 spills per year – Triggers investigation		>1 discharge from emergency overflow in a calendar year
	Macerators	Storm Tank Size (68 l/h or 2hrs storage)	Dry Day Spills	108% of PFF – Triggers investigation		>10 spills over average of 3 years
	FFT [92% / 95%]	20 spills/year – Triggers investigation	Pollutions Cat 1-3	Storm Tank size not agreed with EA		
	DWF – Total Daily Volume (Q90)	108% below FFT – Triggers investigation		EDM – data reliability less than 90% - Triggers investigation		
	Max Flow – Total Daily Volume	Storm Tank Size (68 l/h pr 2hrs storage) – Triggers investigation		Pollutions Cat 1-3 (root cause UWWTR / s.94 of WIA91 N-C)		
	WINEP7 FFT	EDM – data reliability <90% - Triggers investigation		Deterioration in water course status		
	WINEP7 Storm Tank size	Pollutions Cat 1-3 (Trigger)		Emergency overflow discharged >1x in calendar year		
	Storm Tank size (permit value)	DWF – Total Daily Volume (Q80) – Triggers investigation				
	Dry Day Spills	Deterioration in water course status				
	Pollutions Cat 1-3					

Asset Type and number	Wastewater Treatment Works	Network Assets		
	352 WWTWs	249 combined sewer overflows (CSOs)	98 Sewage Pumping Stations (SPS)	21 Emergency Overflows (EOs)



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Delivery Plan

Asset Compliance

May 2026



Asset Compliance

Environmental permits set out the parameters within which each works should operate including the volume of treated effluent and when overflows can be discharged into rivers and streams without causing environmental harm.

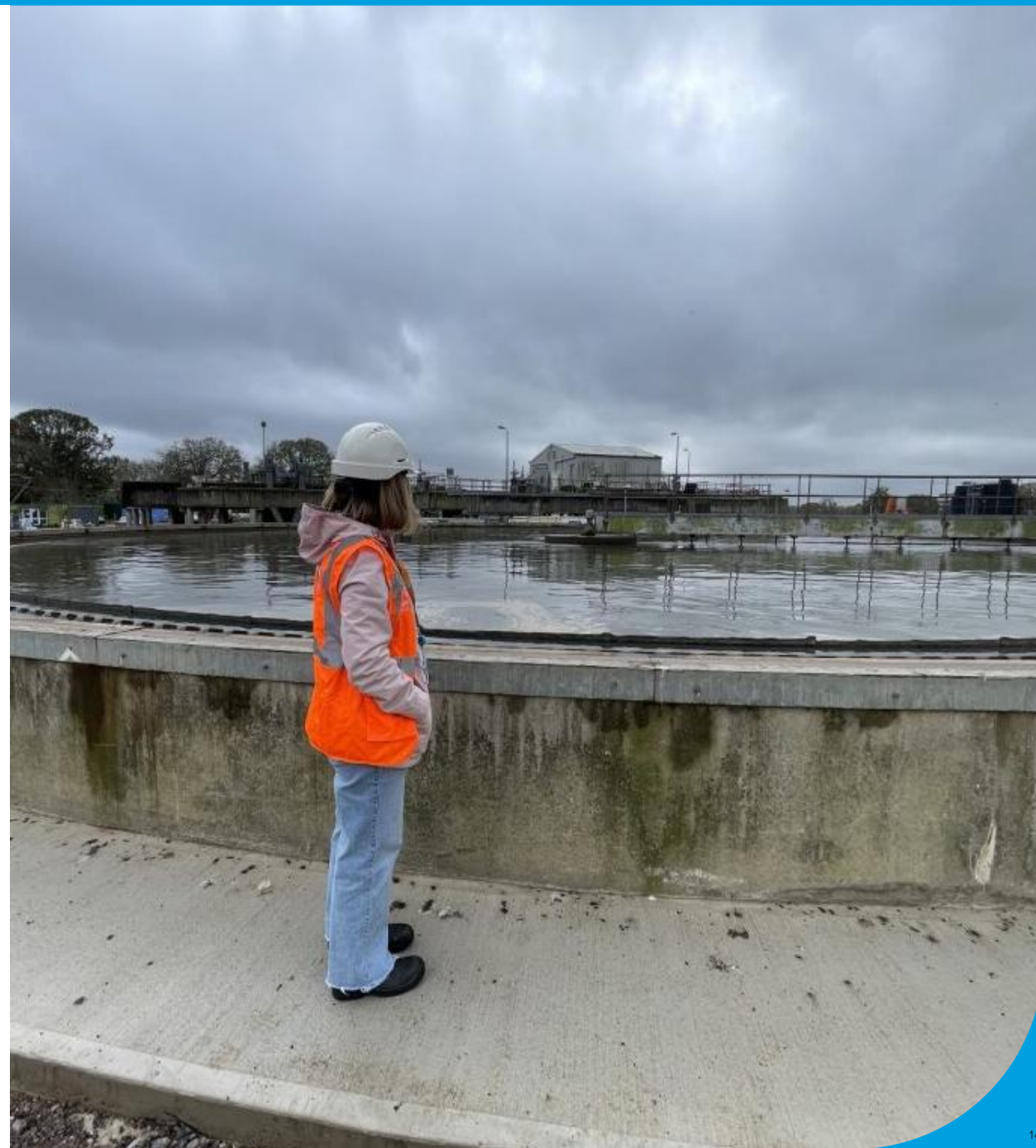
- We have reviewed our asset base against the performance metrics and triggers set out in the Enforcement Order and now have a clearer view of our compliance status across our WWTWs and Network assets.
- We have assigned a status to each of our assets:
 - ✓ as potentially Compliant ('PCO'); Assessed as compliant.
 - X as potentially non-compliant ('PNC').
 - UKR as unknown risk where status of compliance is unknown.
 - N/A where a factor is not applicable at site.
- The next step is to carry out investigations into any assets that have not performed as we would have expected or the current compliance position is unknown and to review where they may have breached a trigger (as outlined on the previous page).
- We will analyse these results further but expect that solutions to remedy any non-compliance or triggers will already be included in our current Remediation/Delivery Plan. If this is not the case, we will look to see if any further action is necessary.
- We have reviewed the requirements of our environmental permits to check that all relevant WWTW and Network assets are permitted. In cases where the permit conditions do not meet requirements we have engaged with the Environment Agency to seek any new or revised permits.

90%	Pollutions Cat 1-3	DWF - Total Daily Volume (Q80)	An emergency overflow has discharged >1 in any calendar year
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	N/A	N/A	
N/A	N/A	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	✓	N/A	
N/A	X	N/A	
N/A	✓	N/A	
N/A	X	N/A	
N/A	✓	N/A	



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Our governance structure



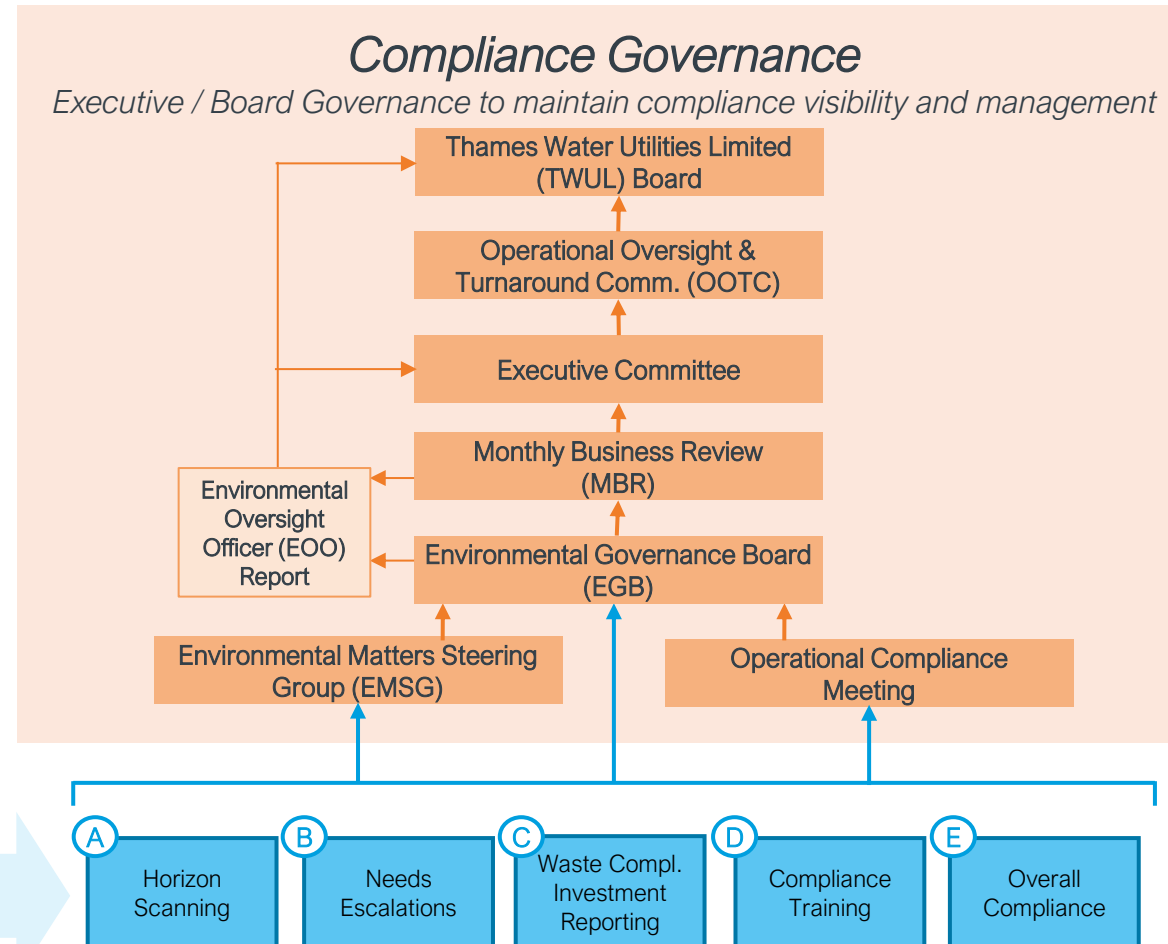
Our governance structure is outlined below with five compliance inputs into our governance forums which all have specific Terms of Reference ('TORs').

Compliance reporting is tracked at regular senior management forums; each has the authority to pass proposed investment decisions to a capital allocation governance forum of an equal seniority.

Compliance Reporting

Five compliance inputs are reviewed by the Environmental Governance Board ('EGB') for escalation as required:

- (A) Horizon Scanning:** Details of new compliance regulations or changes to existing regulations.
- (B) Needs Escalations:** Escalations of non-compliance with present permits.
- (C) Waste Compl. Investment Reporting:** Summary dashboard containing status updates for key compliance investment programmes.
- (D) Compliance Training:** Report indicating status of compliance training rollout for Ops and senior management.
- (E) Overall Compliance:** Review of present compliance position.



Capital Investment Governance



Items to be passed from Compliance Governance forums to Capital Investment Governance forums for forward action as appropriate.

Management Forums

Oversight of compliance is managed through a number of different forums.

- We hold fortnightly Operational Compliance Meetings ('OCM') to review WWTW numeric discharge compliance.
- Similarly, we hold monthly Environmental Management Steering Group ('EMSG') meetings to provide an overview of existing and future environmental compliance performance, permitting and risk including horizon scanning.
- Both of these forums can escalate items to the EGB which in turn can escalate items further to the Monthly Business Review ('MBR') meeting or the Executive Committee chaired by our Chief Executive.
- The outputs from the EGB and MBR meetings are reported to the Executive and Board through the Environmental Officer Oversight report.

Horizon scanning has been developed to identify potential future risks or regulatory change that may require remediation.

The needs escalation pathway maps out the routes for escalating a compliance risk. The risk is first brought to the attention of the Operations Compliance Meeting.



Environmental Compliance – Management Oversight

We have introduced a Compliance Assessment System which is a specifically designed application that enables operational teams to assess environmental permit compliance on a structured and consistent basis. The system provides enhanced visibility of our compliance position to senior management and serves as the single source of truth for tracking compliance and identifying potential risks of non-compliance.

The screenshot displays the 'Compliance Assessment System Digital Tool' interface. It includes a navigation menu with 'Site View', 'Team View', and 'Admin View'. A table on the left defines compliance statuses: PCO (Potentially compliant), NA (Not applicable), PNC (Potentially non-compliant), and UKR (Unknown risk). The main area shows a form for editing a factor for Bampton (BAMP51ZZ), with an 'Assessment History' table and an 'Action Notes' field.

PCO	Potentially compliant	Factor is compliant as per the permit. Please provide evidence in the notes.
NA	Not applicable	Factor is not applicable to the configuration of the site
PNC	Potentially non-compliant	Factor is not compliant, or factor was not compliant at some point in the year-to-date. Please provide notes as to why NB: If a past non-compliance has occurred and has since been addressed and will have low likelihood of occurring again, you should mark this factor as PCO. Please provide evidence of this in the notes.
UKR	Unknown risk	It is not possible to assess if this factor is potentially compliant or not Please provide notes as to why

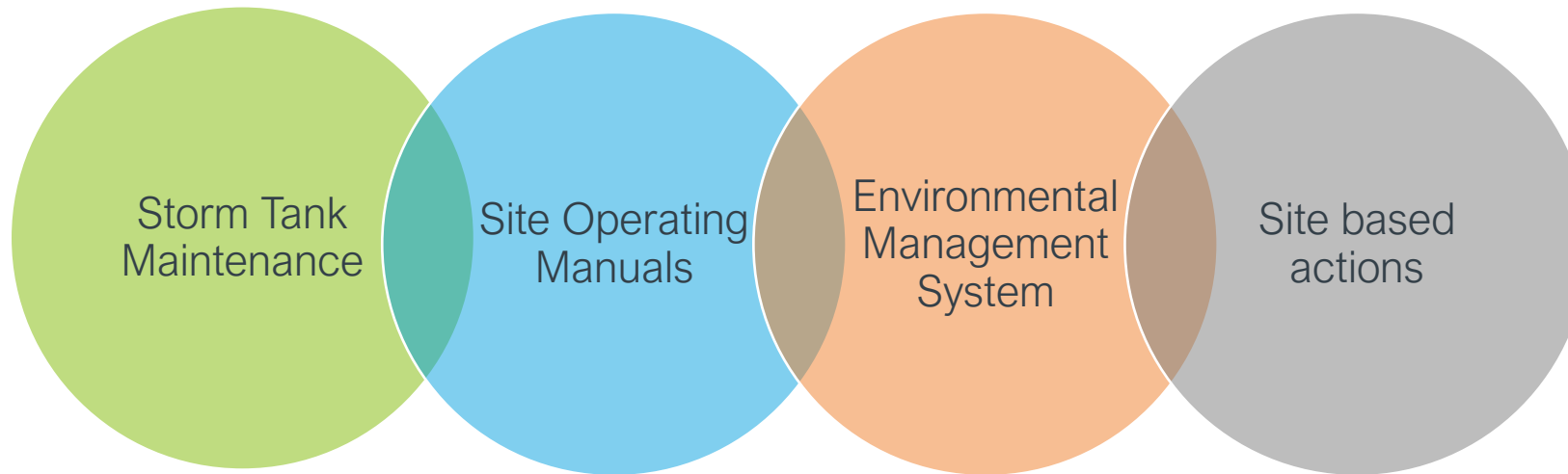
Start with marking a factor's compliance status

For PNC or UKR - capture action notes

Compliance Assessment System: Environmental Permit Factors

Following an initial compliance assessment of our assets against both numerical and non-numerical permit compliance in August 2025, we have taken targeted action to address gaps in compliance. We have reduced permit factors identified as potentially non-compliant by approximately 26% and work is continuing to reduce this further.

CAS tracks remediation actions within the tool and serves as a single source of reference for permit compliance.



Our Management Operating System ('MOS'), is an established framework for Wastewater operations with its overall purpose to embed best practice.



Specifications in the environmental permits for each site.

Questions asked to establish whether we are compliant with the permit requirements. There are approximately 48,500 assessment factors like those above or questions across STW, SPS & CSO.

If a factor is assessed as potentially non-compliant or unknown risk, an action is assigned to mitigate or quantify the compliance risk.

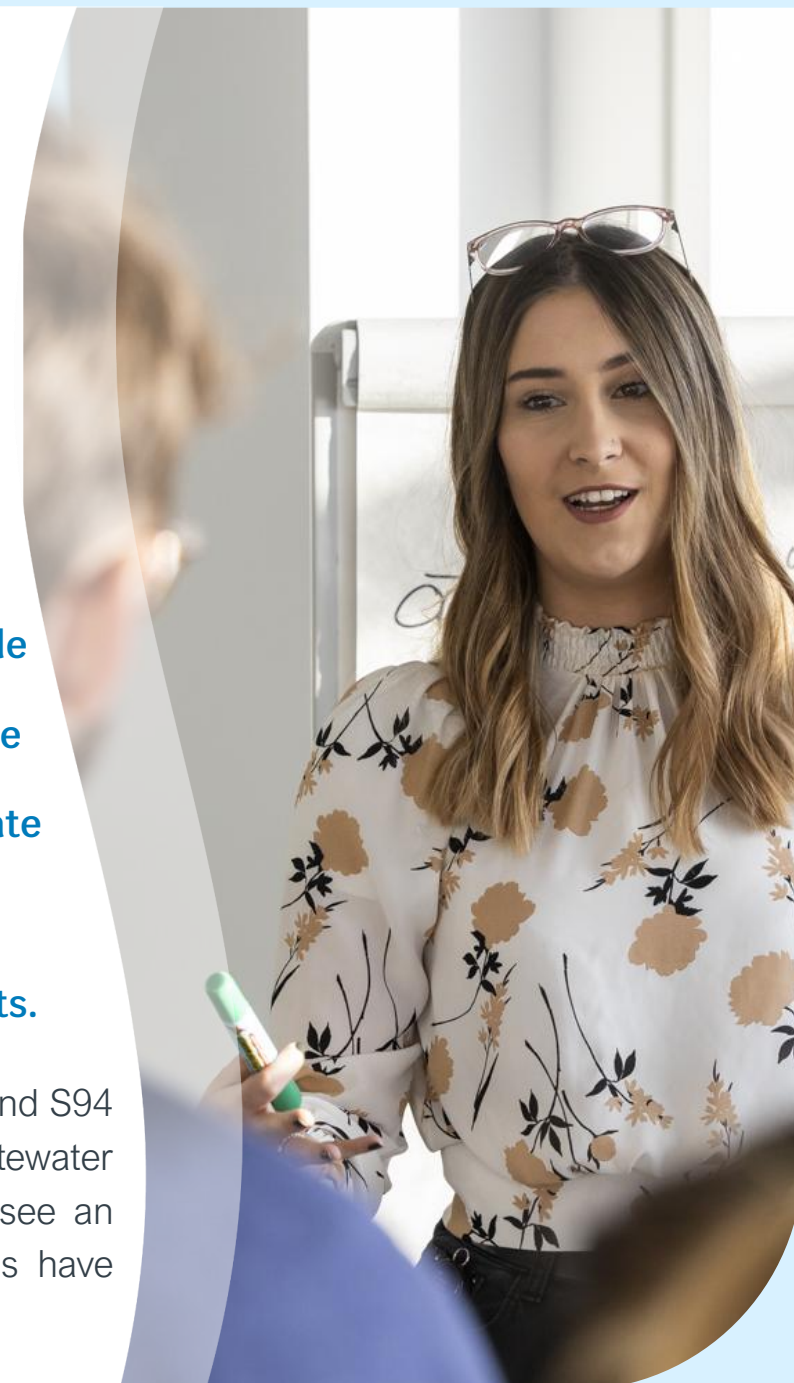
Compliance Training for Operational staff

We have further developed the compliance-focused online Toolbox-Talk into a new e-learning module that was launched on 1 April 2026. The module is live on our Learning On Tap platform and can be mapped to specific roles within the organisation who will be required to complete the training annually.

The screenshot displays a training module titled "Compliance: Protecting Our Environment and Our Business". It includes sections such as "Navigating Compliance in Wastewater Operations", "Compliance: the full water cycle and treatment process", "The Urban Wastewater Treatment Regulations in Practice", "Compliance permits and locations", "Escalation Procedures and Reporting", and "What to do if something isn't right". The interface features text boxes, diagrams, and a circular flowchart illustrating the reporting process.

A detailed training and competency framework is being developed to provide assurance that all wastewater staff are trained and competent to operate compliantly and in line with environmental permit requirements.

As reported in November 2025 an on-line training toolbox talk on the requirements of the UWWTR and S94 WIA91 was prepared as a pre-recorded module and added to the training requirements for wastewater operational teams to complete. Since the submission of our last report, we have continued to see an increase in the number of employees completing this module and so far, over 2000 employees have completed the course.





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Next Steps



Next Steps

Our Delivery Plan

1. Continue to deliver against the capital projects set out in the Remediation Plans.
2. Embed a robust change control protocol that governs, approves and tracks changes to our capital programme.
3. Assess the outcomes of our asset compliance review in relation to compliance with Regulation 4 UWWTR and Section 94 WIA91.
4. Continue to address operational factors across our assets that impact compliance.
5. Review training requirements for key management roles in non-operational areas of the business.
6. We will report on our progress against the plans in our next six-monthly report due on or before 28 November 2026.



Glossary of Key abbreviations and acronyms

Acronym	Meaning	Acronym	Meaning
AMP	Asset Management Period (e.g. AMP7 = 2020-25. AMP8 = 2025-30)	S94	Section 94 WIA91
EA	Environment Agency	WAAP	Wastewater Asset Assurance Programme
EDM	Event Duration Monitoring	WAAP+/WAAP++	WAAP scope on sites additional to the 157
FFT	Flow to Full Treatment	WIA91	Water Industry Act 1991
PFF	Pass Forward Flow	WINEP7/WINEP8	WINEP programme associated with AMP7/AMP8
Q80/90	Flow percentiles used in DWF assessment	uCSO	Unpermitted Combined Sewer Overflow
SO	Storm Overflow	U_MON4/U_MON6	WINEP monitoring drivers for FFT / Emergency Overflows
STW/WWTW	Sewage / Wastewater Treatment Works	UWWTR	Urban Waste Water Treatment (England and Wales) Regulations 1994



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