



It's everyone's water

# Ofwat Enforcement Order

Six-monthly report November 2025





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Our plans to improve our environmental performance.

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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 requirements 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 against the plans at six monthly intervals. This first report sets out the main requirements of Ofwat's recent enforcement order. Our next report, on 28 May 2026, will reflect the progress made against six broad requirements.

## Six broad requirements



**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.

**We take wastewater away from 16 million customers treating 4,700 million litres of wastewater every day.**





# Executive Summary

## Progress against the Enforcement Order

- We have developed and submitted the following action plans to Ofwat:
  - ✓ WWTW Remediation Plan
  - ✓ Network Remediation Plan
  - ✓ Overflow Plan
  - ✓ Management Plan.
- We also delivered, by 28 November 25, against the specific commitments to:
  - ✓ Demonstrate that we have operational planning and systems in place to review, on an annual basis, catchment changes that may result in the design, construction, operation and maintenance of our WWTW and sewerage network becoming insufficient.
  - ✓ Review the requirements of all our environmental permits relevant to WWTW, sewerage network assets and storm overflows.
  - ✓ Implement the agreed Management Plan and are using compliance information to monitor and address compliance issues.
  - ✓ Implement a programme of annual training for operational staff and senior management and,
  - ✓ Provide to Ofwat a six-monthly report on progress against requirements within the EO and published this report on our website.





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# Key Deliverables





# Key Deliverables

The Enforcement Order ('EO') has six broad requirements requiring four action plans, a WWTW Remediation Plan, a Network Remediation Plan, an Overflow Remediation Plan and a Management Plan in addition to a Delivery Plan which we will begin to report on from 28 May 2026.

EO Requirement	Overview	Reference	Timelines
1. Securing compliance: Sufficient capacity and performance at wastewater treatment works.	<div>Demonstrate WWTWs are designed, constructed, operated and maintained to receive and treat the volumes of wastewater and storm sewage under normal conditions.</div> <div>Ensure relevant assets have appropriate flow-to-full-treatment (FFT) / pass-forward flow (PFF) rates and storage capacity to minimise pollution.</div>	WWTW Remediation Plan	28 Nov 2025
2. Securing compliance: Sufficient capacity and performance of wastewater network assets.	<div>Demonstrate that all wastewater network assets are designed, constructed, operated and maintained to transport sewage and storm flows to treatment works under normal conditions.</div> <div>Ensure network assets have appropriate PFF capacity and storage levels to convey expected volumes.</div>	Network Remediation Plan	
3. Securing compliance: Minimising environmental harm from untreated wastewater discharges.	<div>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.</div> <div>Investigate and take prompt action to remediate high-spilling storm and emergency overflows not already addressed by other plans.</div>	Overflow Plan	

# Key Deliverables continued...

The Enforcement Order ('EO') has six broad requirements requiring four action plans, a WWTW Remediation Plan, a Network Remediation Plan, an Overflow Remediation Plan and a Management Plan in addition to a Delivery Plan which we will begin to report on from 28 May 2026.

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

# Additional requirements to deliver by 28 November 2025

In addition to the four action plans there are six subcomponents of the broad requirements that are due for completion by 28 November. These are set out below.

## Requirements 1e 2e & 3e Environmental Permits

- Demonstrate that we have reviewed the requirements of all environmental permits to check that all **a)** relevant WWTW and **b)** sewerage network assets are permitted and to check whether permits' metrics are adequate for the volumes of received wastewater and storm sewage and the needs of the catchment consistent with obligations under the UWWTR.
- Demonstrate that we have reviewed all storm overflows to check whether the necessary permits are in place.

## Requirement 4b Implementation of the Management Plan

- Demonstrate that the management plan has been implemented and is using compliance information to monitor and address UWWTR and section 94 WIA91 compliance issues within the company and to plan for long-term needs of our catchments.
- Implement a programme for carrying out annual training of operational staff and senior management.

## Requirements 1d & 2d Catchment changes

- Demonstrate that we have operational planning and systems in place to review, on an annual basis, catchment changes that may result in the design, construction, operation and maintenance of our WWTW becoming insufficient or our sewerage network becoming insufficient for the volumes of wastewater and storm sewage they receive.





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# Our Plans





# Enforcement Order Requirements 1, 2 & 3:

## The WWTW, Network and Overflow Remediation Plans

### Overview of our plans

- We have presented our plans to Ofwat.
- Our plans detail how we will:
  - Review our assets for issues relating to compliance with our regulatory obligations.
  - Conduct a root cause analysis of potential non-compliance against the specified requirements.
  - Remediate non-compliance.
  - Put in place processes and procedures to investigate and take remedial action in relation to high spilling storm and emergency overflows and
  - Work with the Environment agency to seek changes to permits where required.

**Our asset base consists of 353 WWTWs, 249 Combined sewer overflows ('CSOs'), 98 sewage pumping stations ('SPS') and 21 Emergency Overflows ('Eos').**

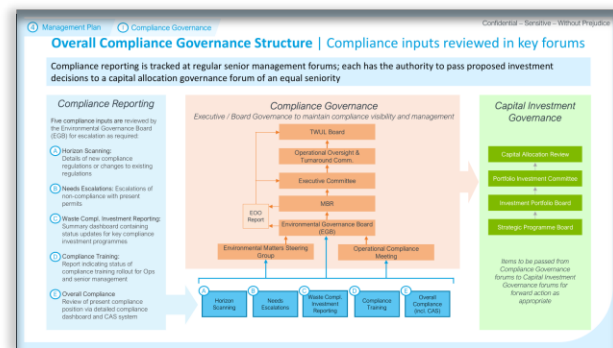




# Requirement 4: Oversight of compliance, Management Plan

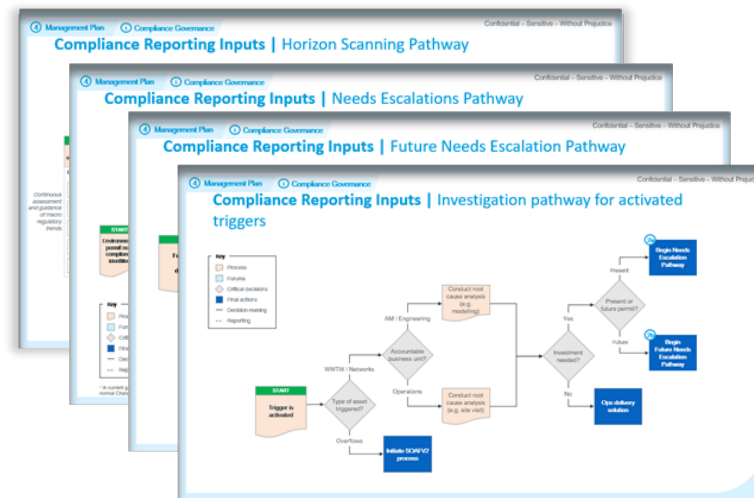
We have reviewed our management processes to provide our senior management, and our Board the necessary compliance information to challenge the company's compliance performance. The outputs of our review is in the form of a 'Management Plan', which was submitted to Ofwat and consists of three main focus areas.

## I. Compliance Governance Plan



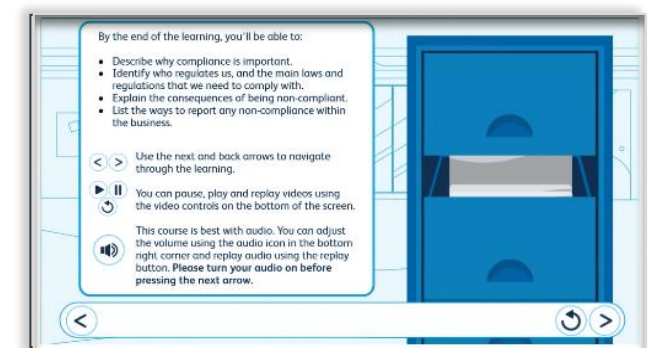
Details of existing compliance governance forums, processes, and reporting used by TWUL to monitor and address our regulatory obligations.

## II. Implementation Roadmap



Comprehensive view of all recent enhancements made and roadmap to implement **enhancements** to existing compliance governance, processes, and reporting.

## III. Training

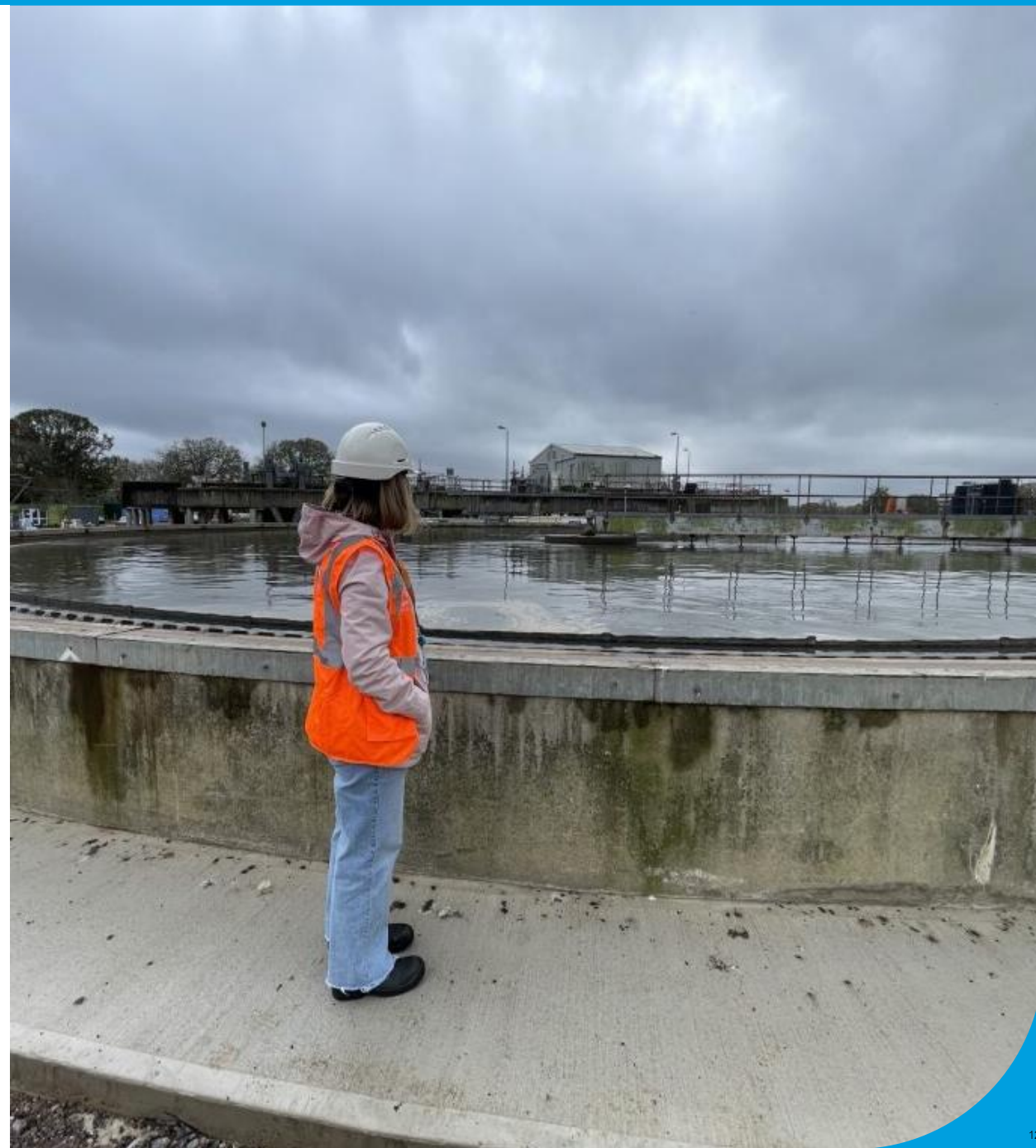


Summary of ongoing training activities to further enhance compliance performance.



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# Additional Deliverables





# Requirement 1e, 2e & 3e Environmental Permits

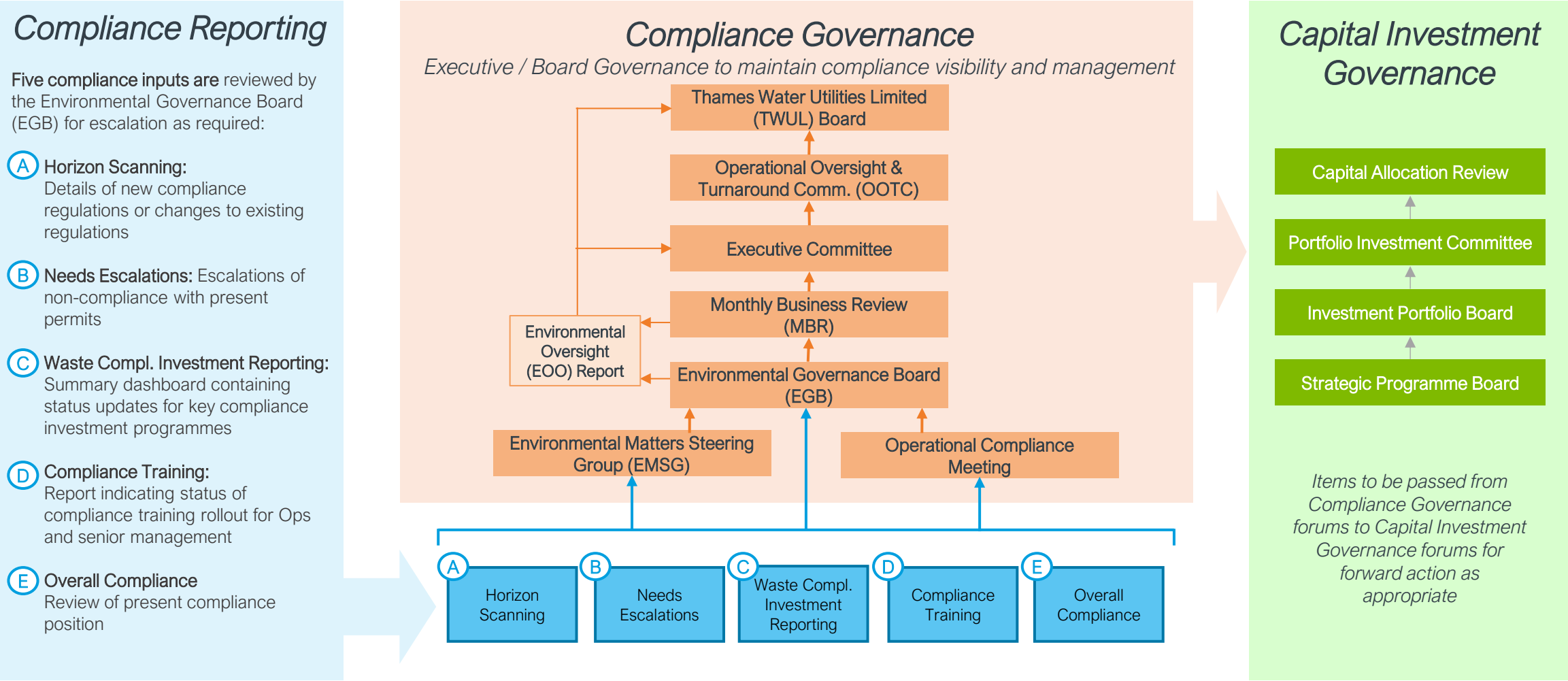
Environmental permits set out the conditions under which a permit holder may make a discharge. The Environment Agency issues environmental permits.

- Environmental permits set out the parameters within which each works should operate including the volume of treated effluent and overflows that can be discharged into rivers and streams without causing environmental harm.
- We have reviewed the requirements of our environmental permits to check that all relevant WWTW and network assets are permitted and that the requirements for DWF, FFT/PFF, storm tank capacity and other discharge restriction requirements are adequate for the volumes of received wastewater and storm sewage and the needs of the related catchments.
- In cases where the permit conditions do not meet requirements, we have included these in our remediation plans. We will engage with the Environment Agency to seek any new or revised permits. For example, 33 of our WWTW have Temporary Deemed Consents ('TDCs'). We have completed applications for these and submitted all 33 to the Environment Agency for review.



# Requirement 4b: Implementation of the Management Plan| Compliance inputs reviewed in key forums

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





# Requirement 4b: Implementation of the Management Plan

The Environmental Permitting Compliance Assessment System is a four-part system designed and implemented to provide a comprehensive view of compliance against environmental discharge permits across all our assets.

Thames Water

Compliance Assessment System Digital Tool

Welcome to Thames Water's Compliance Assessment System digital tool (CAS)

This tool enables all colleagues to contribute to the understanding and improvement of the company's compliance position against environmental permit requirements. For more information of CAS please go to our [SharePoint page](#)

To proceed, please select one of the following views:

Site View

Team View

Admin View

I want to focus on one site to:

- Assess compliance
- Update actions
- Update site details

I want to access multiple sites to:

- Assess compliance
- Update actions
- Update site details

I want to:

- Assign/Edit/Update factors
- Assign/Edit/Update actions
- Make bulk updates

Start with marking a factor's compliance status

For PNC or UKR - capture action notes

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

Currently editing for Bampton (BAMPS1ZZ)

Ascending

Filter by Status

Local Operation

Filter by Category

Filter by Factor

New Assessment

Assessment History

Status: \*

Observation: \*

Why have I selected this status, what have I observed? e.g. I have checked / observed the screen is broken.

Save

Status	Assessment Date	Assessed By	Notes
PCO	02/09/2025		Observation: Where screens are removed from service for planned or
UKR	31/12/2021		

Filter by Compliance Status

Filter by Action Status

Filter by Team

Filter by Action Source

Compliance status

Action status

Forecasted completion

Actual completion

L1: \*

L2: \*

Owner: \*

Priority Route: \*

Forecasted Completion: \*

Actual Completion: \*

Action Notes: \*

1. Identified

1.1 Action created in CAS

What action will I do or have done to resolve the issue, e.g. Installation of a telemetry alarm is organised, OR Risk is raised in APS and awaiting allocation of budget

# Requirement 4b: Implementation of the Management Plan: Compliance reporting

We have reviewed our internal compliance reporting enabling senior management, Executive and Board to have full oversight of compliance.

Waste | Detailed Dashboard Definitions (1/2)

Confidential – Sensitive – Without Prejudice

Type	Metric	Unit	Definition	Oversight
Permits	# sites with a Cat 1&2 CCS breach (ex. IED)	# of sites with numeric permits, excludes IED breaches		EA shadow
	Discharge Permit Compliance (BAU) % sites			EA
	Discharge Permit Compliance (incl. WINEP) % sites			EA
	# Near Fail (excl. WINEP)			EA / Ofwat
	# Near Near Fail (excl. WINEP)			EA / Ofwat
	# of Cat 1-4 CCS breaches			Internal
EA Effluent: Outcomes	Descriptive perm			
	Flow compliance			
	Flow Compliance			
	Dry Weather Flo			
	Indicative FFT nc			
	Failed MCERTS			
Flow	Max Flow excee			
	Pass forward flo			
	Pass forward flo			
	Indicative FFT nc			
	Storm Overflows			
	Discharges			
UWWTD / WIA: Outcomes	EDM data availa			
	Av per sensitive			
	Av for all sites			
	EDM data availa			
	% of EDMs prov			
	Dry Day spills			
EA other: Outcomes	IED - # sites with			
	IED - # of cat. 1-			
	% of sites with o			
	# of new permits			
	Air & Waste			
	Waste Pollutions			

Waste | Compliance Dashboard - Definitions

Confidential – Sensitive – Without Prejudice

Type	Metric	Unit	Description	Oversight
Permits	# sites with a Cat 1&2 CCS breach (ex. IED)	# of sites with numeric permits, excludes IED breaches		EA shadow
	Discharge Permit Compliance (BAU) % sites			EA
	Discharge Permit Compliance (incl. WINEP) % sites			EA
	Descriptive permit potential non-compliance - %	From CAS		Internal
	Flow compliance (FFT) % sites	% Sites with a flow to full treatment condition compliant with FFT		EA shadow
	Flow Compliance (FFT) - # sites	Sites with a flow to full treatment condition; 92 / 95 whole year of data, rolling 12mo		EA
EA Effluent: Outcomes	Dry Weather Flow failures - # sites (3/5 years)	Q90, including failures, 3 / 5 years		Permit
	Max Flow exceedances - # sites (current year)	Rolling year		EA
	Storm Overflows	EDM data availability (EA measure)	% of devices reporting >90%, on all EDMs to the environment	EA shadow
	WINEP7	# of schemes complete in line with IBP date	Delivery of waste WINEP schemes, per BENEf	IBP
	WINEP8	# of schemes complete in line with Reg date	Delivery of waste WINEP schemes, per BENEf	EA
	WINEP9	# of schemes complete in line with IBP date	Delivery of waste WINEP schemes, per BENEf	IBP
EA other: Programme	WAAP	# of schemes complete in line with IBP date	Delivery of waste WAAP schemes, per IBP	IBP
	WAAP+	# of schemes complete in line with IBP date	Delivery of waste WAAP schemes, per IBP	IBP
	Mylo	# of schemes complete in line with FEO commitment	Delivery of Mylo schemes/commitments, per Mylo assurance sign off (TBC)	Ofwat
	Discharges	Av per sensitive site	Average spill count per overflow with data availability offset, calendar year to date	Ofwat
	Discharges	Av for all sites	Average spill count per overflow with data availability offset, calendar year to date	Ofwat
	Storm Overflows	EDM data availability (Ofwat measure)	Secondary measure for spill count	Ofwat
UWWTD / WIA: Outcomes	% of EDMs providing real time data	% of EDMs providing real time data		Internal
	Dry Day spills	# days YTD	As per retrospective guidance, pending WIRI	EA
	DDS - # storm overflows	As per retrospective guidance, pending WIRI		Internal
	IED	IED - # sites with CCS 1&2 breaches	# of IED sites (n=25) with CCS 1-2 breaches	EA
	EA other: Programme	IED	# of PCD schemes delivered	EA
	Other IBP	Air & Waste	# of new permits obtained	IBP



# Requirement 4b: Compliance Training for operational staff and senior management

TWUL has completed three new training initiatives in recent months with the launch of the 'Complying with Our Legal and Regulatory Obligations' training module for all TWUL employees, a compliance-focused online '**Toolbox-Talk**' for operational employees and **CAS training** for specific operational staff.

## Toolbox talk

- We have developed an online toolbox talk for our operational staff on the requirements of the UWWTR and S94 WIA91.
- So far more than 1500 of our waste operations employees have completed the course.

## Permit briefing

- We are in the process of planning permit briefings to our operational teams.

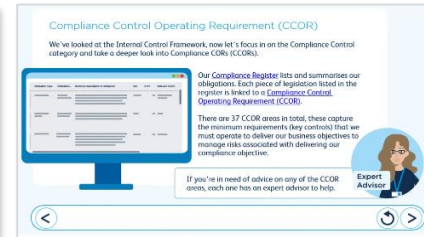
We have introduced an e-learning training module on why compliance matters, the consequences of non-compliance and how to report non-compliance. We are looking to develop this further to provide additional focus on our wastewater obligations.

## E-learning

### Training overview



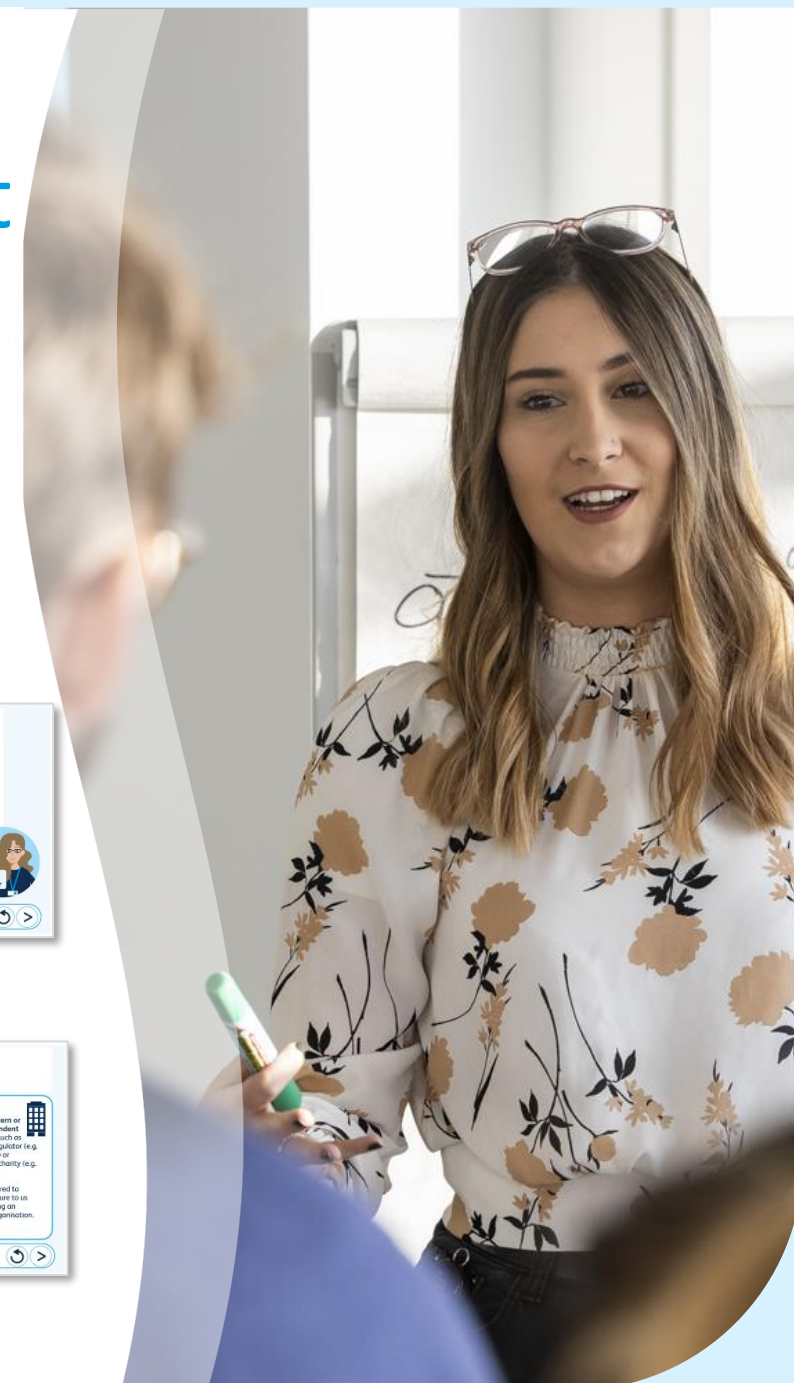
### Compliance Register



### Key Obligations (WIA 91, UWWTR, License)



### Escalation Protocols





# Catchment changes

Requirement: Demonstrate that we have operational planning and systems in place to review, on an annual basis, catchment changes that may result in the design, construction, operation and maintenance of our WWTW becoming insufficient.



- Our Drainage and Wastewater Management Plan ('DWMP') sets out our long-term plans to enable our wastewater systems, and drainage networks that impact them, to be extended, improved and maintained so that they remain resilient to future pressures such as climate change and population growth.
- The plan is over 25 years, from 2025 to 2050, and will be renewed on a 5-year cycle. The plan has been developed to mitigate the forecast impacts of climate change and population growth up to 2050.
- We expect the population in our area to grow by more than 2 million people by 2045. We're also expecting extreme weather events to become more frequent and intense.
- A changing climate and growing population present increasing challenges to how we manage wastewater now and in the future.
- We have produced flow and load forecasts for all WWTW. We are moving from manually obtaining local planning authority data for each catchment to working with Edge Analytics along with several other population scenarios to build a more robust platform.
- As we review our DWMP in 2028 we will build climate change forecast data into our modelling and will look to automate our forecast methodologies.





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# Next Steps





# Next Steps

## Our Delivery Plan

1. We will start to deliver against the obligations set out in the WWTW Remediation Plan, the Network Remediation Plan, the Overflow Plan and the Management Plan according to the timelines set out in each plan.
2. We will put a change control process in place that details any required amendments to the plans.
3. We are making our catchment planning models more robust by moving from manual data updates to more automatic processes to produce flow and load forecasts for all WWTWs.
4. We will continue to provide regular training to our operational staff and senior management team.
5. We will report on our progress against the plans in our next six-monthly report due on or before 28 May 2026.







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