

Water company pollution incidents

Guidance note

Reference number: GN 018

Document Owner: Head of Business Regulation and Permitting

Who this document is for

Water companies, including Water and Sewerage Companies (WaSCs), Water Only Companies (WOCs), and New Appointments and Variations (NAVs)

What this document is about

This guidance explains when and how to self-report polluting discharges from wastewater and water supply infrastructure in Wales. It includes detail about when to self-report, whether an Environmental Permitting Regulations (EPR) 2016 permit or a Water Industry Act (WIA) 1991 consent is in place, or not.

It describes the information you should provide in a self-report and during your response to a pollution incident. It details other communication types we expect to support transparency about your operations. It also has information about the types of review you can request.

What this guidance does not include

This guidance does not include when and how you should self-report dry day spills from storm overflows following retrospective analysis. This will be included in a future version.

This document does not state which pollution incident data is reported to Ofwat, the Water Services Regulation Authority, in the Environmental Performance Assessment (EPA). This information will be shared separately.

Regulatory context and scope

This guidance sets out regulatory arrangements between us and supports our duties under relevant legislation, including the Water Resources Act 1991, Environment (Wales) Act 2016, WIA 1991 and EPR 2016.

From 1 January 2026, it replaces Operational Instruction (OI) 16_02 Recording and categorising water industry self-reported pollution incidents for water companies.

We are broadly aligned with the guidance issued by the Environment Agency (EA) for England, but there are some differences in Wales to reflect our regulatory approach and different legislation.

Contact for queries and feedback

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Version History

Document version	Date published	Summary of changes
Version 6, legacy EA, and NRW Operational Instruction (OI) 16_02	01/11/2012	Applies from 1 January 2013
Version 1, GN018 Water company pollution incidents	03/12/2025	Applies from 1 January 2026. Changes include the following: <ul style="list-style-type: none"> • this guidance is for water companies only • additional detail about self-report requirements that have been in place since 2012 • additional detail about self-reports from non-compliant storm overflow discharges following the installation of new flow meters and event duration monitors (EDM and EDMS) • detail about self-reports for EPR water discharge activities and Schedule 5 requirements • removal of the provision to request a no impact claim • clarification that water discharges to controlled waters have a minor impact (minimum), although groundwater exclusions can apply • amendments to reflect our updated regulatory approach • greater emphasis on information quality in self-reports • new self-report, updates and notification checklist • new duplication and incident action plan checklist
Version 2, GN018 Water company	21/05/2026	Applies from 21/05/2026. Key updates are outlined below. Minor amendments have also been made throughout the document. <ul style="list-style-type: none"> • Updated section 2.4 Groundwater and surface water

Document version	Date published	Summary of changes
pollution incidents		<ul style="list-style-type: none"> • Updated section 2.5 Water discharge and groundwater activities • New section 3.3 Sensitive receiving waters • New section 3.4 Low flows • New section 3.5 with category 4 examples • New section 4.3 Trade effluent consents • Updated section 5.3 Non-permitted discharges from a permitted outfall • Updated section 7 Discharges to land • Updated section 8.3 Time frames • New section 9 Communications • New section 10 Evidence requirements • New section 17.1.1 Flow (FPF and PFF) • New section 17.1.2 Flow (FFT) • New section 21.1.1 Auto analyser discharges • New section 22.1.1 Discharges from stop tap leaks • Updated section 23 Water Industry Act discharges • Updated section 24 Misconnections • Updated section 25 Dye tracing • Updated section 27 Review principles • Updated section 29 Third party polluter • Updated section 30 Request to duplicate • Updated section 31 Incident Action Plans • New section 32 Mitigation measures • Updated Annex 1 Excel file • Updated Annex 2 Excel file • Updated Annex 3 timeframes table • New Annex 4 Flows charts

Contents

INTRODUCTION	8
1. Scope	8
1.1 Applicability	8
1.2 Coverage	8
1.3 Discharge types	9
1.4 Polluting discharges	9
1.5 Responsibility	9
2. Definitions	10
2.1 A pollution incident	10
2.2 A duplicate report	10
2.3 A recurring pollution incident	10
2.4 Groundwater and surface water	11
2.5 Water discharge and groundwater activities	11
2.6 As soon as reasonably practicable	12
2.7 EPR 2016 offences	12
2.8 WIA 1991 offences	12
2.9 Directly applicable legislation	12
3. Incident categorisation	12
3.1 Environmental receptors	12
3.2 Pollution impact categorisation	13
3.3 Sensitive receiving waters	13
3.4 Low flows	13
3.5 Category 4, no environmental impact	14
4. Your duties	14
4.1 Urban Waste Water Treatment Regulations 1994	14
4.2 Statutory responsibilities for pollution incidents	14
4.3 Trade effluent consents	15
5. Self-report types and our role	15
5.1 Polluting discharges from regulated sites (non-compliant)	15
5.2 Polluting discharges from regulated sites (compliant)	16
5.3 Non-permitted discharge types from a regulated site	16
5.4 Unpermitted and non-permittable polluting discharges	16
6. When you may not need to self-report	16
7. Discharges to land	17
7.1 Groundwater exclusion	17
7.2 Sewage discharges to land	17
7.3 Potable water discharges to land	18
7.4 Hydraulic overload, multiple discharges to land	18
8. Self-report requirements	19
8.1 Provide evidence of information sources	19
8.2 Time frames	19
8.3 EPR permits (condition 4.3 and Schedule 5)	20
8.4 Consistent approach for all self-reports (EPR and non-EPR)	20
8.5 Receptor types	21
8.6 Recurring polluting discharges	21
8.7 Extreme weather	21
8.8 Electricity supply	22
8.9 Sludge and waste-handling operations	22

9.	Communications	22
9.1	Introduction to Annex 1	22
9.2	Email subject naming convention	23
9.3	Pollution incident (PI)	23
9.4	Notifications (N).....	24
9.5	Information (I).....	24
9.6	How to use the checklist	25
9.7	Maintenance records.....	25
9.8	New information in an update.....	26
9.9	Where to send comms	26
10.	Evidence requirements	26
10.1	Visual evidence	27
10.2	Samples	27
10.3	Biological surveys	28
10.4	Plans	28
10.5	Data	28
10.6	Third party	29
10.7	Provide timely updates and a final report	29
11.	Pollution incident response requirements.....	29
11.1	Stop polluting discharges, remediate and mitigate	29
11.2	Protect public health and the environment	29
11.3	Prevent recurrence.....	29
11.4	Resolve root cause	30
12.	Our responsibilities when we receive reports	30
12.1	What we will do	30
13.	Data quality and cooperation	30
13.1	Ensure accuracy and completeness	30
13.2	Handle personal data lawfully	31
13.3	Provide supplementary information when required	31
13.4	Support regulatory reporting.....	31
13.5	Resolve discrepancies cooperatively	31
13.6	Resolve premises type differences	31
14.	Substantiate a pollution incident record	31
14.1	Use of reliable evidence to substantiate.....	31
14.2	Always substantiate self-reported polluting discharges.....	32
	WASTEWATER ASSETS SELF-REPORT GUIDE.....	32
15.	Treated final effluent from WwTWs – EPR	32
15.1	Schedule 5 permit requirements for numeric limits	32
15.2	OSM and UWWTR sample results.....	32
15.3	Operational samples (not OSM) and level of concern.....	33
15.4	Visual observations (final effluent or inlet of WwTW)	34
15.5	No flow	34
15.6	Disinfection and UV day dose failures.....	35
16.	Storm overflows (SOs) at WwTW – EPR	35
16.1	Non-compliant discharges from storm overflows.....	35
16.2	Compliant discharges from storm overflows with an environmental impact	37
16.3	Storm overflow with storm tank(s) and EDMS	37
16.4	Storm overflow from a Last in Line Overflow (LiLO) SPS.....	37
17.	Emergency overflows (EOs) at a WwTW or SPS – EPR.....	38

17.1	Consolidated in a WwTW permit or a separate SPS EO permit.....	38
17.2	Emergency overflows acting as storm overflows.....	38
18.	Storm overflows on the network – EPR	38
18.1	Storm overflow from an SPS with a storm tank and, or a wet well	39
19.	Unpermitted discharges from an SO or EO – EPR.....	39
19.1	Unpermitted storm overflows (uSOs) (GN21).....	39
19.2	Unpermitted emergency discharges.....	39
20.	Non-permittable discharge (not EPR) – sewer, rising main, surface water outfalls	39
20.1	Foul sewer or inspection chamber	39
20.2	Rising main	40
20.3	Self-report polluting discharges from a surface water outfall (SWO).....	40
	WATER SUPPLY ASSETS SELF-REPORT GUIDE.....	40
21.	Treated process effluent discharge at WTWs – EPR	40
21.1	Numeric permits	40
21.2	Operational samples	41
21.3	Visual observations (discharge point or inlet of WTW).....	41
21.4	No flow	42
22.	Non-permittable discharges from the water distribution network	42
22.1	Water distribution assets	42
22.2	Pumping station emergency discharges	43
22.3	Untreated (raw) water	43
23.	Water Industry Act (WIA) discharges	43
23.1	Section 165 WIA	43
23.2	Section 166 WIA	43
23.3	Self-report requirements	44
23.4	Operational expectations	44
23.5	Information requirements	45
23.6	Mitigation measures	45
	OTHER TYPES OF POLLUTION INCIDENTS.....	45
24.	Misconnections	45
24.1	Your responsibilities and initial actions.....	45
24.2	Self-reports, requests to duplicate or review polluter	46
24.3	Investigations that span two calendar years	46
24.4	New or recurring misconnections	46
25.	Dye tracing.....	47
25.1	Use of dye.....	47
25.2	Pollution incident investigation	47
25.3	Public reports of discolouration	47
25.4	Link and assign pollution incident records.....	47
25.5	Dye tracing outside of pollution investigations.....	47
26.	Flooded assets	48
26.1	Definition	48
26.2	After a flood event.....	48
	REQUESTS TO REVIEW, DUPLICATE AND IAPS.....	48
27.	Review principles	48
27.1	Our responsibilities.....	48
27.2	Review requests are the exception	48

27.3	When to submit a request to review	48
27.4	How to submit a request to review	49
27.5	Timeliness	49
27.6	Our approach	49
27.7	If we reject your proposed change	49
27.8	Final decision	49
27.9	Annual cut-off	49
27.10	Missed time frames	49
28.	Review the impact category	50
28.1	Category 1 and 2	50
28.2	No review option for category 3	50
28.3	Impact categories	50
29.	Third party polluter	50
29.1	Our approach	50
29.2	Evidence of third party	51
29.3	Pollution incident records	51
29.4	Responsibility criteria	51
29.5	Foreseeable items	51
29.6	Object size and relevance	52
29.7	Unforeseeable to an extraordinary degree	52
29.8	Loss of power	52
30.	Request to duplicate	53
30.1	Our approach to requests to duplicate	53
30.2	When to request to duplicate	53
30.3	Duplication criteria	54
30.4	Managing duplication, reports and request to escalate	54
30.5	Duplication across calendar years	55
30.6	Assets with an event duration monitor (EDM)	55
30.7	Reasons we may accept a request to duplicate	56
31.	Incident Action Plans	56
31.1	When to use	56
31.2	Content and requirements	57
31.3	Submission and review process	57
31.4	File naming convention	57
31.5	Duration and expiry	58
32.	Mitigation measures	58
ANNEX 1 POLLUTION INCIDENT SELF-REPORT, NOTIFICATION OR INFORMATION CHECKLIST		59
ANNEX 2 INCIDENT ACTION PLAN AND DUPLICATE REQUEST TEMPLATE		59
ANNEX 3 TIME FRAMES FOR POLLUTION INCIDENT CORRESPONDENCE		59
ANNEX 4 FLOW CHARTS TO SUPPORT INTERPRETATION		61
Annex 4A When to self-report a sewage discharge to land		61
Annex 4B When to self-report a potable discharge to land		62
Annex 4C When to self-report a potable discharge from a water supply asset		63
Annex 4C(1) Discharge from a stop tap leak at a customer's property		64
Annex 4C(2) Public water supply auto-analyser		65
Annex 4C(3) Other (e.g. service reservoir, reservoir e.g. scour valve releases, borehole)		66

Introduction

This guidance note should be read alongside the following annexes, which support its application and interpretation:

- [Annex 1: Pollution incident self-report, notification or information](#) checklist (provided as a separate Excel file)
- [Annex 2: Incident Action Plan and duplicate request](#) template (provided as a separate Excel file)
- [Annex 3: Time frames for pollution incident](#) correspondence (included within this guidance note)
- [Annex 4: Flow charts to support](#) interpretation (included within this guidance note), including:
 - [Annex 4A When to self-report a sewage discharge to land](#)
 - [Annex 4B When to self-report a potable discharge to land](#)
 - [Annex 4C When to self-report a potable discharge from a water supply asset](#)

The annexes form an integral part of this guidance and should be used together with the main document where relevant.

1. Scope

1.1 Applicability

This guidance applies to water companies operating in Wales, which includes:

- Water and sewerage companies: Dŵr Cymru Welsh Water (DCWW), Hafren Dyfrdwy (HD)
- New appointments and variations (NAVs)
- Water only companies (WOCs)

For the purposes of this document:

- “You/your” refers collectively to all water companies
- “We/us/our” refers to Natural Resources Wales (NRW)

1.2 Coverage

This guidance applies to potential or actual pollution incidents arising from your assets or activities that may impact groundwater, surface water, land, or air. Potential pollution incidents are situations where an issue has been identified and, although a pollution incident has not yet occurred, it is reasonably likely to do so.

Water discharges from the assets listed below are most likely to pollute surface water, groundwater and land:

- wastewater treatment works (WwTWs)
- storm overflows (SOs)
- sewage pumping stations (SPSs)

- emergency overflows (EOs)
- rising mains
- foul and surface water sewer network lines
- water treatment works (WTWs)
- water supply distribution system
- sludge and waste-handling operations

Emissions from anaerobic digestion plants and gas plants typically cause pollution to air.

1.3 Discharge types

This guidance applies to:

- permitted discharges, where statutory notification requirements exist under the Environmental Permitting (England and Wales) Regulations 2016 (EPR) permit conditions. This guidance sets out how to comply with the requirements in permit condition 4.3 and Schedule 5
- unpermitted and non-permittable discharges
- polluting discharges from operations under the Water Industry Act 1991

1.4 Polluting discharges

Pollutants include substances found in, but not limited to, the following:

- crude and storm sewage effluent
- trade effluent, including hazardous substances
- sewage sludge
- chlorinated water
- process effluent and sludge from water treatment operations
- chemicals
- suspended solids from excavations, repairs and scouring

1.5 Responsibility

You have statutory duties for pollution incidents that involve your assets and activities, more detail is in section [4 Your duties](#). We will assign the incident record to you unless you provide clear evidence in your communications that you are not responsible for the pollution incident. More detail about the identifying the polluter, is in section [29 Third party polluter](#).

When we record a pollution incident, we are not necessarily deciding liability for any offences that may have been committed.

We expect you to report pollution incidents you may observe when you carry out your daily duties. For example, if you see any type of polluting matter (not necessarily sewage) entering a river from a surface water outfall, you should report it. We may need to carry out investigations independently or jointly, to gather evidence and identify the polluter.

2. Definitions

2.1 A pollution incident

A “pollution incident” is defined in the Water Special Measures Act (WSMA) within the Water Industry Act (WIA) as follows:

“For the purposes of this section, references to pollution incidents that are attributable to the system of an undertaker:

(a) are references to discharges from any structure or apparatus comprised in that system of any content which may be harmful to health or the quality of the environment, but

(b) do not include references to discharges of treated effluent in accordance with an environmental permit (including any conditions to which it is subject).”

We will use the term “polluting discharges” in this document. This refers to any water discharge that causes pollution. When you become aware of a polluting discharge you should self-report it, whether the discharge is permitted or not.

2.2 A duplicate report

These are multiple reports of the same discrete occurrence.

If we receive multiple reports that relate to the same polluting discharge, for example from a cracked foul sewer on the same date and time, we will treat the first report as the master pollution incident and link any subsequent reports to it.

Duplicates are identified and linked as they arise. If we overlook a record we should have duplicated, email ICC to contact the lead officer to discuss:

icc@cyfoethnaturiolcymru.gov.uk

Duplicate reports are not the same as duplication requests.

2.3 A recurring pollution incident

A recurring pollution incident is a repeat polluting discharge with the same root cause(s).

Each polluting discharge should be recorded as a separate incident record. However, if we have agreed action is being taken to resolve a known problem, it may be considered a recurring pollution incident.

A recurring pollution incident is when the same root cause(s) recur, the polluting discharge is from the same location but at different times. You can request to duplicate incident records under these circumstances, but only if the duplication criteria apply. More information about the criteria and other requirements is provided in sections [30 Request to duplicate](#).

2.4 Groundwater and surface water

This guidance applies to pollution incidents that affect groundwater (via land) and, or surface water.

For the purposes of this guidance, references to groundwater and surface water have the same meanings set out in the [Environmental Permitting \(England and Wales\) Regulations 2016](#).

Groundwater means all water that is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

Surface water includes inland surface waters, transitional waters, coastal waters and territorial waters, and excludes groundwater:

- Inland surface waters: natural or artificial waters, above or below ground, including rivers, lakes, canals, ponds and reservoirs
- Transitional waters: estuaries and brackish water bodies near river mouths
- Coastal waters: marine waters up to one nautical mile from the baseline, including enclosed docks
- Territorial waters: waters within three nautical miles of the baseline.

A ditch, stream or river that is normally a surface water feature does not lose that status because it is temporarily dry. A polluting discharge into a dry channel that would reasonably be expected to carry water at other times may still be treated as pollution of surface water.

Self-reports should not be limited to features classified as surface water. You should report pollution incidents that may impact isolated field drains, enclosed lakes or ponds or other enclosed features. This is because they could impact, or be a pathway to, the receptors listed in section [3.1 Environmental receptors](#).

2.5 Water discharge and groundwater activities

A water discharge activity under [Regulation 35 \(1\) Schedule 21 3\(1\)\(a\) of EPR 2016](#), is defined as:

- “(a) the discharge or entry to inland freshwaters, coastal waters, or relevant territorial waters of any (i) poisonous, noxious, or polluting matter, (ii) waste matter, or (iii) trade effluent or sewage effluent
- (b) the discharge from land through a pipe into the sea outside the seaward limits of relevant territorial waters of any trade effluent or sewage effluent”

A groundwater activity under [Regulation 35 \(1\) Schedule 22 3\(1\) of EPR 2016](#), is defined as:

- (a) the discharge of a pollutant that results in the direct input of that pollutant to groundwater
- (b) the discharge of a pollutant in circumstances that might lead to an indirect input of that pollutant to groundwater
- (c) any other discharge that might lead to the direct or indirect input of a pollutant to groundwater

- (d) an activity in respect of which a notice under paragraph 10 has been served and has taken effect
- (e) an activity that might lead to a discharge mentioned in paragraph (a), (b) or (c), where that activity is carried on as part of the operation of a regulated facility of another class.

2.6 As soon as reasonably practicable

As soon as reasonably practicable (ASARP) means acting without undue delay. In this guidance, it applies to the timing of self-reports, other types of communications and to taking prompt, practical steps to implement required actions.

2.7 EPR 2016 offences

Under EPR 2016 the following apply:

- Regulation 38 (1)(a)(b) details the requirement to have a permit for a water discharge activity or groundwater activity and to comply with its requirements
- Regulation 38 (2) details that it is an offence not to comply with a permit

See our website for information about our [Enforcement and sanctions policy](#).

2.8 WIA 1991 offences

Under the WIA the following apply:

- Section 165 (3) refers to steps you must take to ensure the effluent is free of polluting matter, as soon as reasonably practicable (ASARP)
- Section 165 (8) requires you to comply with the consent

See our website for information about [Enforcement and sanctions policy](#).

2.9 Directly applicable legislation

We may take enforcement action for offences from directly applicable legislation when appropriate. A full list of legislation we can enforce is listed in our [Offence Response Options](#) webpage.

3. Incident categorisation

3.1 Environmental receptors

We record principal and secondary receptors, but pollution can impact more than two. Examples of receptor types are listed below:

- surface water
- groundwater
- fisheries
- land (includes agricultural, conservation areas, designated sites)
- amenity
- commerce

- potable abstractions
- ecology
- hydromorphology
- air
- human health

We require information about the receptor types in your self-reports. More information about our requirements is in section [8.5 Receptor types](#).

3.2 Pollution impact categorisation

We use four categories to assess the actual impact of a pollution incident:

- category 1 (major): major adverse effect or damage to the environment, people or property, or to our assets, operation or reputation
- category 2 (significant): significant adverse effect or damage to the environment, people or property, or to our assets, operation or reputation
- category 3 (minor): minor adverse effect or damage to the environment, people or property, or to our assets, operation or reputation
- category 4 (no impact): substantiated occurrence with no impact or risk of minor harm

Water discharges, including sewage and trade effluent, contain pollutants. If these enter groundwater or surface waters in a way that does not comply with a permit or consent, they will cause at least a minor (category 3) environmental impact. See section [7.1 Groundwater exclusion](#).

3.3 Sensitive receiving waters

We refer to sensitive receiving waters in this document. A polluting discharge may have a higher environmental impact, compared to sites not considered sensitive. We define sensitive receiving waters using the [small package treatment plant exemption criteria](#) as a discharge that is:

- within 500m of a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, Biological Site of Special Scientific Interest (SSSI), freshwater pearl mussel population, bathing water or shellfish waters
- within 200m of an aquatic local nature reserve
- in tidal areas, located above the Mean Low Water Spring (MLWS) tide limit

3.4 Low flows

A polluting discharge may have a higher environmental impact when the receiving water is in 'low flow'. We consider low flow to be equivalent to Q95 river levels. You can use the L95 level as a proxy for Q95. This information is available on our [River levels, rainfall and sea data](#) webpage. Select the most appropriate gauging station, add the 'typical level' layer, and identify L95 as the lowest boundary of the shaded band. As this is a static dataset and indicative only, you should also use other available information, such as data shared through drought or water resources liaison, to inform your assessment.

3.5 Category 4, no environmental impact

In some cases, we may assess a pollution incident as category 4 based on information you provide within 14 days of notification.

We may assess a pollution incident as having no environmental impact where, for example:

- we receive a report from a member of the public, but you provide evidence that the discharge meets the sewage discharge to land exclusion, the potable discharge de minimis, or that no discharge occurred
- you self-report an issue and later provide evidence that the discharge was fully contained, for example on impermeable land or within the sewerage network. We do not expect many self-reports to lead to this outcome
- an LUT exceedance is short-lived, and you provide evidence to support this. This does not apply automatically. We will consider the specific circumstances, such as the duration of the exceedance, weather conditions and overall impact, and may assign a higher category.

If we assess a pollution incident as category 3, we will not consider a request to downgrade it to category 4.

4. Your duties

4.1 Urban Waste Water Treatment Regulations 1994

You must:

- provide and maintain collection systems that effectively convey urban wastewater to treatment plants
- ensure the design, construction and maintenance of these systems meet Directive requirements and prevents pollution
- take account of wastewater treatment needs, population growth, and environmental protection objectives
- comply with monitoring and reporting duties

This duty applies to all agglomerations where urban wastewater is generated, and includes infrastructure serving domestic, industrial, and surface water sources.

Failure to maintain adequate networks may result in enforcement action from us, under either or both, the Urban Waste Water Treatment Regulations (1994) and EPR (2016).

4.2 Statutory responsibilities for pollution incidents

You have key duties under the Water Industry Act (WIA) 1991. These include amendments introduced by the Water Special Measures Act (WSMA) 2025 and related legislation.

You must maintain your assets to prevent pollution and ensure your infrastructure operates securely, efficiently, and properly. This includes preventing water infiltration and ensuring sewers are free flowing and free from obstructions such as tree roots.

You must meet environmental obligations to prevent pollution of groundwater and surface water, respond to pollution incidents without delay and comply with the EPR (2016) and WIA (1991).

4.3 Trade effluent consents

You must control trade effluent discharges into public sewers to prevent pollution and to protect sewerage infrastructure and treatment assets. This includes the following responsibilities:

- authorise all trade effluent discharges through valid trade effluent consents
- monitor compliance with consent conditions and take timely action to return discharges to compliance
- apply proportionate and appropriate enforcement action where consent conditions are breached
- ensure your trade effluent teams notify colleagues within the business where non-compliance may require further investigation or escalation
- Where non-compliance continues and there is a risk to the environment, notify us about the potential pollution risk.

This includes risks that:

- affect downstream combined sewer overflows
- compromise the structural integrity of the sewer network, for example through corrosion
- disrupt or damage wastewater treatment processes
- stop unauthorised discharges and mitigate their impacts
- take preventative action where needed, including considering the installation of event duration monitors
- stop non-compliant discharges that may damage sewerage infrastructure, disrupt treatment operations, or harm the environment.

5. Self-report types and our role

The four types of polluting discharges you should self-report as pollution incidents are described in the following sections.

5.1 Polluting discharges from regulated sites (non-compliant)

A permitted or consented water discharge can have an environmental impact when the requirements of them are not met. We will record self-reports about polluting discharges as pollution incidents and assess compliance with the EPR permit conditions on a Compliance Assessment Report (CAR).

We will regulate non-compliant WIA consented discharges by referring to our [Enforcement and Sanctions policy](#). We will not send a CAR as they are a regulatory tool to assess compliance with EPR permit conditions.

5.2 Polluting discharges from regulated sites (compliant)

Some polluting discharges may comply with permit conditions but may still have an environmental impact. For example, a discharge from an emergency outfall (EO) during an emergency, as defined in the permit condition.

We will assess the impact of this type of polluting discharge on the environment. We may assess the discharge as compliant on a CAR, if the discharge complies with certain permit conditions. Although we may identify other non-compliances and require you to take action, such as applying to vary the permit.

5.3 Non-permitted discharge types from a regulated site

Some polluting discharges from a permitted outfall do not comply with permit conditions because the type of discharge is not covered by the permit. You should self-report them. For example, a discharge of crude sewage from a storm overflow outfall when the permit is for a discharge of storm sewage, not crude. Another example would include a rainfall-dependent discharge from an outfall permitted solely for discharges during emergency conditions. You should submit the information described in section [8.3 EPR permits \(condition 4.3 and Schedule 5\)](#) when you tell us about non-permitted discharge types from an outfall that has a permit for a particular effluent type.

We will record non-permitted polluting discharges and assess them as non-compliant on a CAR if they come from an outfall that has an EPR permit for a different discharge type.

5.4 Unpermitted and non-permittable polluting discharges

You should self-report polluting discharges, such as unpermitted and non-permittable ones. We will record them on our system, and our response will be in line with our [Enforcement and Sanctions policy](#). We will not report our findings in a CAR as there is not an EPR permit for these types of discharges. This is unless the circumstances in section [5.3 Non-permitted discharge types from a regulated site](#), apply.

An example of an unpermitted water discharge includes a storm overflow on the network that does not have an EPR permit for a water discharge activity.

An example of a non-permittable polluting discharge is a release of crude sewage from a break in a foul sewer. We do not issue EPR permits for this type of discharge so would not write a CAR.

We may issue warnings for permit breaches on a CAR, but warning letters are the equivalent when they cannot be recorded on a CAR. If a different enforcement response is required in accordance with our [Enforcement and Sanctions policy](#) for a site we regulate, we will communicate that to you in writing.

6. When you may not need to self-report

In the following situations, you may not need to self-report if you:

- identify an issue but do not have evidence of a polluting discharge
- respond promptly and prevent a polluting discharge

- are confident that pollution has not occurred (e.g., telemetry communication issue only).

However, if your investigations confirm that for example, an event duration monitor (EDM) operated correctly and a non-compliant discharge was validated, the pollution incident should be self-reported, even if a water discharge is not evident on arrival.

You do not need to self-report if the groundwater exclusion applies, see section [7 Discharges to land](#). However, if discharges to groundwater (whether the self-report exclusion applies or not) are secondary to a more significant water discharge activity elsewhere, you should include detail about them in the self-report. Provide a plan and annotate the location of additional releases to land, to provide an overview of a pollution incident. Refer to section [7.4 Hydraulic overload, multiple discharges to land](#).

7. Discharges to land

Polluting discharges to land can impact a range of receptors. They can affect:

- groundwater – through infiltration into soil
- surface water – over land or via subsurface flow
- land – can affect amenity, commercial use, ecology, or human health

7.1 Groundwater exclusion

You do not need to self-report discharges to land if the polluting discharge is so small in quantity and concentration that it will not cause deterioration in groundwater quality. This is set out in [The Environmental Permitting \(England and Wales\) Regulations 2016](#), Schedule 22, paragraph 3(3)(b).

7.2 Sewage discharges to land

This section applies where sewage from water company assets has discharged to land. The checks must be considered in the order set out below and are illustrated in the flow chart [Annex 4A When to self-report a sewage discharge to land](#)

1. Where a polluting discharge to land also enters surface water, you should self-report it.
2. Where the discharge does not enter surface water, you should consider whether it is fully contained on an impermeable surface and cannot soak into ground. If it is fully contained, you do not need to self-report.
3. Where the discharge is not fully contained, you should assess whether the groundwater exclusion applies. If the quantity or concentration of the discharge is so small that it will not affect groundwater quality, you do not need to self-report. Where the groundwater exclusion applies, you should still take appropriate action to mitigate the pollution incident and remove as much effluent and any solid deposits as reasonably practicable.
4. If the groundwater exclusion does not apply, you should consider whether the discharge occurred at a groundwater-sensitive location. Where the location is sensitive in relation to groundwater, the pollution incident should be self-reported.

Groundwater-sensitive locations include areas:

- within a Source Protection Zone (SPZ) 1 or areas of high groundwater vulnerability

- within or within 50 metres of a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site or Site of Special Scientific Interest (SSSI)
 - within an ancient woodland
5. Where the location is not groundwater-sensitive, you should assess whether the impact of the discharge is significant or extensive, or whether it affects amenity, ecology, human health or land use. Where it does, you should self-report this. Where it does not, you do not need to self-report.

Impacts to land use may include:

- parks, sports fields, footpaths and public spaces
- aesthetic impacts (for example sewage debris)
- effects on land use, including agriculture (for example impacts to livestock or crops)

7.3 Potable water discharges to land

This section applies where potable water from water company assets has discharged to land. The checks must be considered in the order set out below and are illustrated in the flow chart [Annex 4B When to self-report a potable discharge to land](#)

1. Where the discharge meets drinking water quality standards and meets the de minimis exclusion criteria, you are not required to self-report. The de minimis exclusion is explained in this guidance [Groundwater activity exclusions from environmental permits - GOV.UK](#), relevant sections are 2, 2.7 and 2.8. This permitting guidance informs the self-report approach.
2. Where the discharge does not meet the de minimis exclusion criteria, you should consider whether the discharge enters surface water.

Where the discharge enters surface water, you should sample the discharge to check if it contains more than 0.05 mg/l of chlorine, causes a visual impact, or results in the mobilisation of suspended solids. Where any of these apply, the pollution incident should be self-reported. Where none apply, you do not need to self-report.

3. Where the discharge does not enter surface water, you should assess whether the impact is significant or extensive. Where the impact is significant or extensive, you should self-report it.
4. Where the impact is not significant or extensive, you should consider whether other impact categories are affected, such as ecology. Where other impact categories are affected, you should self-report as a pollution incident. Where no other impacts are identified, you do not need to self-report.

7.4 Hydraulic overload, multiple discharges to land

If there are multiple discharges to land from inspection chambers along a length of sewer because of hydraulic overload, you should reference them in the self-report for the main polluting discharge to surface water. For example, when you self-report a rainfall-dependent polluting discharge from an emergency overflow (EO) at a sewage pumping station (SPS), you should list any known discharges to land in connection with the main polluting discharge to surface water.

You do not need to send separate self-reports for the smaller discharges from upstream inspection chambers to land, or groundwater, if there is a direct connection to a pollution incident from an outfall to surface water that you have self-reported to us.

Refer to sections [8.7 Extreme weather](#) and [26 Flooded assets](#).

8. Self-report requirements

When you self-report an issue you should provide the appropriate level of detail about the pollution incident. Refer to [Annex 1: Pollution incident self-report, notification or information checklist](#) for the information we expect self-reports to contain.

8.1 Provide evidence of information sources

You should provide detail from the source of information and submit it as supporting evidence in your self-report and updates. Examples include, but are not limited to:

- visual observations by you or those working on your behalf (photographs, videos)
- sample data from operator self-monitoring (OSM) or operational monitoring (non-OSM)
- telemetry alarm information
- flow meter readings that record flows like those passed forward for treatment
- monitoring data from event duration monitors (EDM) that records discharges to the environment
- monitoring data from EDMS monitors that records discharges into storm tanks
- reports from third parties such as members of the public (MOP), emergency services, local authorities

We may report a pollution incident that you should have self-reported if we become aware of it. This may include a numeric breach, an issue we observe during a planned site inspection or following a review of data during an audit.

8.2 Time frames

We expect you to self-report as soon as reasonably practicable (ASARP). This is normally within two hours from when you become aware of a polluting discharge, or when you know an issue is likely to lead to a release of a polluting discharge that may cause an environmental impact.

Where telemetry provides a reliable indication of a pollution risk, we expect you to self-report ASARP. However, we do recognise that justified delays may occur, for example where you may need to verify data. When this applies, explain the reasons for a delayed self-report in your submissions to us.

[Annex 3: Time frames for pollution incident](#) correspondence is a summary of timescales for expected correspondence for pollution incidents.

8.3 EPR permits (condition 4.3 and Schedule 5)

8.3.1 Water discharges

When a water discharge activity is permitted by an EPR permit it normally has the self-report condition 4.3 that refers to information requirements you must provide in Schedule 5. Permit condition 4.3 says to notify us (self-report) if the discharge **may** lead to significant pollution.

To comply with this condition, you should also self-report non-permitted discharge types from an outfall that has a permit for a particular discharge, as described in section [5.3 Non-permitted discharge types from a regulated site](#).

You should apply a precautionary approach to self-reports about the potential for a significant pollution from a permitted site, to comply with the permit condition. The environmental impact cannot be determined at the time of report, so the pollution incident has the potential to lead to significant pollution. Therefore, you should self-report a pollution incident that could have a category 1, 2 or 3 impact, as it may lead to significant pollution. The environmental impact will be assessed when the pollution incident has concluded, and the evidence has been reviewed.

Refer to section [9.1 Introduction to Annex 1](#) for guidance on how to provide the right level of information to comply with permit condition 4.3 and Schedule 5. You should also refer to information specified in the permit, when you submit a self-report.

For releases of polluting discharges from an EPR permitted asset:

- condition 4.3 requires you to self-report ASARP
- Schedule 5 Part A requires you to self-report, with supporting information within 24 hours maximum
- Schedule 5 Part B requires information about how to prevent a recurrence

[Annex 3: Time frames for pollution incident](#) correspondence describes communication time frames.

Also refer to sections [6 When you may not need to self-report](#) and [9.7 Maintenance records](#), which outline the circumstances where you may not need to self-report.

8.3.2 Air emissions

Permitted waste and installation sites that have the potential to cause pollution from air emissions should be self-reported, such as from anaerobic digestion or gas treatment plants. You can self-report them with reference to the detail in the [Annex 1: Pollution incident self-report, notification or information](#) checklist, or you can submit the Schedule 5 template in the relevant permit.

8.4 Consistent approach for all self-reports (EPR and non-EPR)

This guidance supports consistent and complete self-reports about polluting discharges. It supports compliance with EPR condition 4.3 and Schedule 5 Parts A(a), A(b), A(c) and Part B.

We expect you to provide the same level of detail about polluting discharges when:

- an EPR permit has condition 4.3
- an EPR permit does not include condition 4.3 (yet)
- they are from an unpermitted asset (waste or clean water)
- they are non-permittable discharges

This requirement is to maintain regulatory consistency.

8.5 Receptor types

When you submit a self-report, include the receptor types that the pollution incident could or has, impacted. You should list all that apply from your immediate observations but indicate those you consider to be the principal and secondary receptors. A list of receptor types is provided in section [3.1 Environmental receptors](#). Detailed impact assessments are not required. However, you should take a precautionary approach and identify any receptors that you consider could be affected.

For example, if sewage effluent escapes from a rising main onto a field and flows over land and enters a watercourse, include surface water as the principal receptor and land as the secondary one. Include other receptors in the self-report where appropriate, such as groundwater and if it is within, or near to a designated site or Site of Scientific Interest (SSSI) for example.

8.6 Recurring polluting discharges

You should self-report recurring polluting discharges as and when they recur. If we have agreed to your request to duplicate as described in section [30 Request to duplicate](#) and we accept your IAP, we will link subsequent reports to the master record.

However, we may not require you to self-report each discharge from a storm overflow with EDM. Refer to section [30.6 Assets with an event duration monitor \(EDM\)](#) for more information about how we may record polluting discharges from these assets, if we have agreed to a request to duplicate them.

You should always self-report a pollution incident if it does not meet the duplication criteria set out in section [30.3 Duplication criteria](#). For example, if a subsequent discharge has an increased environmental impact due to low flow conditions in the receiving surface water.

8.7 Extreme weather

You should self-report non-compliant and unpermitted discharges that occur during extreme wet weather such as heavy rainfall events, flood events or during a named storm. You should self-report those discharges ASARP. If poor weather conditions are widespread and affects the performance of many assets, you should include the reasons for any delayed self-reports.

You should maintain planned capability to manage the impacts of extreme weather, including flood events, high winds, heat, drought, snow, and ice. You should prevent the release of non-compliant or unpermitted polluting discharges, mitigate environmental impacts, and restore assets affected ASARP.

You should self-report the release of non-compliant or unpermitted polluting discharges which involve a submerged permitted asset due to flooding as the Schedule 5 Part A (a) requirement is likely to be relevant. You should provide the specified information in [Annex 1: Pollution incident self-report, notification or information](#) checklist. Refer to section [26 Flooded assets](#).

If the flooded asset is not causing a polluting discharge, then there is no requirement to self-report a pollution incident.

8.8 Electricity supply

You should self-report polluting discharges from permitted assets that occur due to issues with the supply of electricity. You should tell us if you have complied with relevant permit conditions in the permit. Refer to section [29.8 Loss of power](#).

8.9 Sludge and waste-handling operations

You should self-report if you cause pollution to groundwater or surface water when you manage sludge or other waste types from your assets. You should provide information listed in [Annex 1: Pollution incident self-report, notification or information](#) checklist so we can assess the environmental impact.

9. Communications

9.1 Introduction to Annex 1

Annex 1 sets out the minimum information needed to record and triage a pollution incident.

We have produced a checklist of information you should reference when you communicate with us about pollution incidents and other activities we may need to know about: [Annex 1: Pollution incident self-report, notification or information](#) checklist.

This Excel file has three tabs. The first one summarises how to use the checklist and the second is a checklist of information. The third tab is for you to add supporting information, such as photographs, videos, data sets and plans. When you have supporting information, include as much as possible to give a clearer picture of the pollution incident.

You should refer to Annex 1 when you self-report pollution incidents from both the water distribution and wastewater network. When you self-report a pollution incident you must submit an appropriate level of detail so we can assess the environmental impact and compliance with the permit, where relevant.

Use Annex 1 for self-reports about polluting discharges from permitted, consented, unpermitted and non-permittable assets. Ensure the extra level of detail about the pollution incident report type is included in the report (whether the pollution incident self-report is to comply with Schedule 5, or the discharge is unpermitted or non-permittable, or a discharge under WIA).

If you follow the checklist, you will comply with information requirements in EPR permit condition 4.3 and Schedule 5. Remember to comply with condition 4.3 when there is a

non-permitted discharge type from an outfall that has a permit for a different discharge type.

You should also refer to Annex 1 when you need to notify us about a water discharge, under the WIA for example. See section [9.4 Notifications \(N\)](#). Also refer to Annex 1 when you submit information we need to be aware of, see section [9.5 Information \(I\)](#). You do not need to provide information from all the fields in Annex 1, just those that apply in the report type.

Not every pollution incident, notification or information scenario is covered in Annex 1, so adapt it as necessary.

9.2 Email subject naming convention

When you correspond with us, include the following detail in the email heading so we are clear about the type of communication:

[Report type i.e. PI, I or N] – [EPR permit reference / WIA consent reference / Blank]
[Name of site on EPR permit / WIA consent or short descriptor of site/address] – [Short description of issue] – [Report stage]

For example:

- Pollution incident – EPR permit ref] [Permitted site name] – LUT ex – initial
- Pollution incident – Unpermitted SO [Asset name] [Address] – newly identified / known and on GN021 register – final
- Pollution incident – [Site name/address] – Discharge from foul sewer – update 1
- Information – [WIA consent ref] [Site name on consent] – scour valve – initial
- Notification – [WIA consent ref] [Site name on consent] scour valve discharge – 48 hr notification – initial

9.3 Pollution incident (PI)

The email subject heading should state that it is a self-report about a **pollution incident**. Ensure the type of pollution incident is recorded in the report, such as PI – Sch 5 or PI – WIA.

If you cannot provide the required information in the initial report, state when it will be submitted in an update. We will use the information to assess the impact to the environment and assess compliance with the permit conditions where relevant, which will include compliance with condition 4.3 and Schedule 5.

Provide detailed initial, updates and final reports. The final update should ensure that all the Schedule 5 information is provided. This includes the information requirements to satisfy Part B of Schedule 5. This should be provided as soon as reasonably practicable and no later than 14 days, unless agreed with the Lead Officer. Where relevant to the pollution incident, you should submit maintenance records as standard practice. If you do not, we may request them.

You should reference Annex 1 to self-report all pollution incidents from the water distribution system in the same way as those from the wastewater network.

9.3.1 Request an extension to submit the final update

If you need more than 14 days to investigate and gather information before you submit a final update in line with [Annex 1: Pollution incident self-report, notification or information checklist](#), you may request an extension.

There is no automatic extension to the standard time frames set out in [Annex 3: Time frames for pollution incident](#) correspondence. We will assess requests on a case by case basis where there is a clear and evidenced need.

You should contact the Lead Officer as early as possible if you intend to request additional investigation time. Your request should:

- be submitted in writing to the Lead Officer and their team inbox before the standard 14 day time frame expires
- clearly explain why additional time is required
- set out actions completed to date, outstanding actions and proposed time frames for completion.

9.3.2 Further extensions

By exception, we may agree to a further extension, up to a maximum of 60 days from the notification date. The relevant Environment Team Leader must approve this. There are limitations to extension requests because of the need for final pollution incident figures by the end of February for external reports.

9.4 Notifications (N)

Notifications should not be used to tell us about polluting discharges. A report should be marked as a notification if you want to notify us about an activity. Make sure your submission is clearly marked as a **notification** in the email subject heading. An example of a notification report is when you provide 48 hours advance notice of a water discharge from a potable water asset under section 165 or 166 of the WIA.

Refer to section [23 Water Industry Act \(WIA\) discharges](#).

9.5 Information (I)

Make sure your submission is clearly marked as **information** in the email subject heading. Information reports should contain detail about your operations that enable us to carry out our regulatory duties. If you are using dye outside of a pollution investigation you could provide detail about your actions on an information report. See section [25 Dye tracing](#) for pollution investigation circumstances.

Another example of when to use the information field is when you may want to tell us about an activity that we may consider a permit breach if we were not sited on the reasons about your operations.

This includes telling us about operations such as when you direct flow into a storm tank for maintenance purposes when this does not result in a discharge to the environment.

Continue to inform us about this type of operation by means of submitting an information report to us.

We will use this information when we assess compliance with the permit condition about Flow Passed Forward (FPF) to discount flows detected by EDMS into storm tanks, as appropriate.

However, if circumstances change and your actions result in a polluting discharge to the environment, you should submit a self-report for a pollution incident.

Refer to section [16.3 Storm overflow with storm tank\(s\) and EDMS](#).

9.6 How to use the checklist

Annex 1 is a checklist to help you provide an appropriate level of information in your communications to us, whether it is the initial self-report, an update, final update, information or notification. You should review information you provide at each stage and update it, for example the field for the 'summary of issue and observations' may need to be updated for each report.

Use the "EPR Schedule 5 (general)" column E to see what information is typically required when you report any discharge from an EPR permitted site (including unpermitted discharge types from an outfall that has an EPR permit for a particular discharge type). The checklist aligns with permit condition 4.3 and Schedule 5 Parts A(a), A(b), A(c) and B, but you must always check the EPR permit as requirements may vary slightly.

We have listed common scenarios you may communicate to us, in columns B – M of Annex 1. You can filter on the 'Y' markers to see the fields we would typically expect in the self-report or other report types. Not all scenarios are included, and not every 'Y' will be relevant to every report type. Where a field shows 'N/A', we haven't set an expectation for that scenario, but you should include the information if it is relevant.

You should use the checklist as a guide and add any further information you need for your own purposes. You may change the order of questions or adjust the wording, so it fits your systems, provided all required information is still captured.

If you want to make significant changes to the fields or add questions that affect the information submitted to us, you must discuss this with us first. This ensures any changes continue to meet our requirements.

9.7 Maintenance records

You must keep records of asset maintenance activities, for example desludging, pump repairs, screening maintenance or replacement, and ultraviolet (UV) faults.

You should always submit maintenance records where they are relevant to a pollution incident, in line with [Annex 1: Pollution incident self-report, notification or information](#) checklist. You should also provide maintenance information when we request it. We may request these records during an investigation, inspection, audit or liaison meeting.

You do not need to self-report planned or unplanned maintenance where there is no environmental risk, unless agreed otherwise in writing, see section [9.5 Information \(I\)](#). If circumstances change and a risk of pollution arises, you must self-report.

Refer to section [6 When you may not need to self-report](#) for further examples.

9.8 New information in an update

In certain circumstances you may not need to submit a second self-report. You may be able to include new information as part of an update. If this applies always include the master pollution incident record reference in the update.

For example, an update may be appropriate when you have sent information about a numeric sample exceedance or failure for one parameter from an OSM sample and you need to report the results of another parameter, as the results came through later. This would only apply if both results were from the same OSM sample. Refer to sections [15.2 OSM and UWWTR sample results](#) [15.2](#) and [21.1 Numeric permits](#) for more information.

Another example may include when you have self-reported the sample results from an operational sample (not an OSM one) because a level of concern has been reached. When you take additional operational samples during the same pollution incident, sample results from ongoing monitoring should be shared in updates. Refer to the relevant wastewater section [15.3 Operational samples \(not OSM\) and level of concern](#) or water supply section [21.2 Operational samples](#).

Another example may include when you conduct a dye test as part of your pollution incident investigations. You can update your comms from the master record, in your comms to us.

9.9 Where to send comms

Review the checklist in [Annex 1: Pollution incident self-report, notification or information](#) checklist and provide the appropriate level of detail relevant to each type of report to us.

Send all self-reports, updates, notifications or information comms to our Incident Communication Centre (ICC): icc@cyfoethnaturiolcymru.gov.uk

Copy in the relevant compliance mailbox below for self-reports about OSM LUT exceedances or breaches of numeric limits as well as ICC:

- DCWW should copy in: OSM_DCWW@cyfoethnaturiolcymru.gov.uk
- HD should copy in: hafrendyfrdwy@cyfoethnaturiolcymru.gov.uk

ICC will share information received with the relevant Environment Teams as appropriate.

10. Evidence requirements

Your self-report and any updates must include information that:

- is provided promptly to enable us to complete our assessment
- is representative of the pollution incident

- is complete, concise and clearly summarised
- covers all receptors (refer to section [8.5 Receptor types](#))
- addresses the impact, pollution risk and root cause

The following sections describe the main types of evidence you may provide and the standards expected.

10.1 Visual evidence

When you attend site, take photographs of the polluting discharge before it stops wherever possible, to evidence the impact. We expect you to include photographs in your self-reports for all pollution incidents. Provide images of the discharge itself and where it enters the natural environment. Where possible, include upstream and downstream photographs.

We do not expect photographs for retrospective self-reports, such as OSM numeric breaches and exceedances, unless the issue is ongoing.

Photographs and videos (including CCTV) must:

- Be date and time-stamped
- Show relevant stages of the pollution incident
- Ensure the photos have clear context. Refer to other evidence (e.g. site plans) and take photos from multiple angles and locations
- Show the comparative scale, e.g. discharge size compared to watercourse width.

Visual evidence should be collected to show:

- Source: show root cause e.g. pipe failure, blocked screen. If a third party item, include contextual photo showing item next to asset
- Pathway: show discharge route and flow direction
- Receptor: show impact on all relevant receptors, such as amenity, fisheries, ecology, water, land.

For discharges to water, include plume, mixing zone, discharge volume and receiving water scale. If there is evidence of no discharge, show dry channels, pipes or outfall aprons. For amenity, show evidence of impact on public access or use (e.g. signage, sewage debris, visual pollution).

10.2 Samples

We do not expect you to take samples during all pollution incidents, for example where a discharge can be stopped quickly. Do not take samples of the discharge once the issue has been resolved.

You may also sample to check the need to self-report. See [Annex 4: Flow charts to support](#) interpretation. If the sample results confirm the need to self-report, you should share the results in your initial self-report.

Where samples are taken, ensure they are representative of the discharge and its impact. If a representative sample cannot be obtained, for example for retrospective self-reports

where the discharge has already stopped, we do not expect sample results to be submitted.

In your self-report updates, you should include information on the samples, including:

- Location: provide NGR, sample point code or a clear description where the samples were taken
- Sample type: specify how the sample results were obtained, for example field test kit readings, laboratory analysis results, in-situ continuous monitoring
- Parameters: set out the analyses you carried out. We would expect the following, as a minimum, for each pollution type:
 - Sewerage (including SWOs): Ammonia, dissolved oxygen (%), biochemical oxygen demand (BOD), suspended solids, pH, any permitted parameters (for example phosphorus)
 - Water supply: chlorine, suspended solids/turbidity, pH, any permitted parameters (for example metals)
 - Sludge loss pollution: BOD
 - Bathing and shellfish water: *E. coli*, intestinal enterococci

You should sample from the same bank as the discharge if it is safe to do so.

You should take a minimum of two downstream samples: one at the end of the mixing zone and at least one to define the extent of impact. You may need further samples depending on the severity of the pollution incident and available access points.

The mixing zone is defined as the location downstream from a discharge point where the discharge is adequately mixed with the waterbody. Typically, a distance equivalent to seven river widths can be used, but local conditions may mean it is less or more than this. Measure the current water width from edge to edge to reflect the current flow conditions, rather than relying on a typical or assumed river width which may not be representative of the pollution incident.

10.3 Biological surveys

Before you undertake or commission a third party to carry out a biological impact assessment survey, you must discuss this with us. We may have one planned and may require the river bed to remain undisturbed so that we can gather evidence.

10.4 Plans

Plans, such as drainage plans and location maps, should be annotated to support interpretation. They should identify source, pathway, receptor and location of any evidence collected, for example photographs and samples. Always include NGRs.

10.5 Data

Where appropriate, provide relevant data. This includes, but is not limited to, data on EDM discharges (to the environment), storm tank levels, EDMS data (flow into the storm tank), flow passed forward (FPF), flow to full treatment (FFT) or pass forward flow (PFF) meter readings.

Clearly label graph axes and data table columns and specify the unit of measurement. You should also state the reliability of the data, including whether it is MCERTS certified, identify any uncertainties, and set out any data cleansing or assurance you have undertaken.

10.6 Third party

Refer to section [29.2 Evidence of third party](#) for the evidence we expect where you consider the pollution incident to be caused by a third party.

10.7 Provide timely updates and a final report

You should provide timely updates as information becomes available and submit a final report within 14 days from the self-report. This report should confirm the outcome of the investigation and remedial measures. We may consider extending the time frame for you to submit the final update, by exception.

Refer to [Annex 3: Time frames for pollution incident](#) correspondence.

11. Pollution incident response requirements

11.1 Stop polluting discharges, remediate and mitigate

We expect you to stop the pollution incident promptly, collect representative evidence and take action to identify the root cause and remediate the impact. You should always take photographs on arrival and send them in your communications with us.

If the polluting discharge can be stopped within a short time e.g. 10-15 minutes, you should prioritise stopping the pollution incident instead of taking samples. However, for longer fixes, you should collect evidence without delay so that it is representative of the pollution incident.

If there is an Incident Action Plan (IAP) in place for the polluting discharge, we expect you to implement mitigation measures to reduce the frequency of the polluting discharges and minimise the environmental impact, whilst waiting for the long-term resolution. Refer to section [32 Mitigation measures](#).

More information about IAPs is in section [31 Incident Action Plans](#).

11.2 Protect public health and the environment

We expect you to mitigate the environmental impact and clean up polluting matter to protect public health and the environment.

11.3 Prevent recurrence

We expect you to take all reasonable steps to prevent a recurrence and reduce the environmental impact. We expect you to update your management systems, maintenance schedules and IAPs where relevant.

11.4 Resolve root cause

If the root cause is not related to maintenance and cannot be resolved immediately, you should implement a resolution and implement mitigation measures to reduce the environmental impact, see section [32 Mitigation measures](#). Agree the resolution with us using an IAP, as detailed in section [31 Incident Action Plans](#).

12. Our responsibilities when we receive reports

12.1 What we will do

We have a statutory duty to regulate environmental activities under EPR 2016 and UWWTR 1994. We do this by ensuring compliance with permits and treatment standards. Our priority is environmental protection and pollution control. Ofwat is responsible for enforcing economic and service-related duties under WIA 1991.

We will:

- record pollution incidents to build a picture of their extent, impact, and duration
- inform you of reports we receive about your assets or activities, subject to General Data Protection Regulation (GDPR)
- record pollution incidents we identify (such as during a data audit) or those you did not self-report for some reason
- investigate and gather evidence when appropriate
- use third party information where relevant
- assess and substantiate pollution incidents
- categorise the actual environmental impact using our Incident Categorisation Policy.
- recover investigation costs under the “Polluter Pays Principle” which apply whether we attend or not
- check compliance with EPR permits and record breaches on a CAR
- score permit breaches based on the potential environmental impact (this may differ from the pollution incident category)
- consider our enforcement response in line with our [Enforcement and sanctions policy](#)
- close the incident record within 30 days (or within 90 days if extended), or by the end of February for the previous year (whichever is sooner)
- reopen incident records only to correct factual errors or add significant new evidence that materially changes the understanding of the pollution incident
- report pollution incident data in Environmental Performance Assessment (EPA) metrics and other regulatory frameworks

Refer to [Annex 3: Time frames for pollution incident](#) correspondence.

13. Data quality and cooperation

13.1 Ensure accuracy and completeness

You must ensure all data you submit is accurate and complete, whether it is a self-report, an update, for information or a notification.

13.2 Handle personal data lawfully

Both of us must follow organisational policies and procedures to comply with the UK GDPR when handling personal data. This includes ensuring data is shared securely, only when necessary, and managed in line with legal and regulatory obligations. We must comply with these requirements when handling personal data.

13.3 Provide supplementary information when required

We expect you to cooperate and provide information when requested. If you do not, we may use statutory powers, under Section 202 of the WRA 1991 for unpermitted discharges and regulation 60 of the EPR for permitted discharges, to require supplementary information.

13.4 Support regulatory reporting

We will publish pollution incident data and water company performance as part of the annual environmental performance reporting. You will also use pollution incident data to produce Pollution Incident Reduction Plans (PIRPs) and Implementation Reports as required by the Water Special Measures Act (WSMA) 2025.

13.5 Resolve discrepancies cooperatively

Both parties must cooperate to resolve any discrepancies in categorisation or factual reports. We will consider all information, valid requests to review, and escalation appeals. Where mutual agreement cannot be reached, our decision will be final.

13.6 Resolve premises type differences

The premises type is a key component of pollution incident data. Raise any differences with the lead officer promptly so they can be discussed and resolved.

14. Substantiate a pollution incident record

14.1 Use of reliable evidence to substantiate

We will substantiate a pollution incident record if we receive credible evidence that it is occurring or has occurred. This includes photographs, video footage, or information from reliable sources such as you, our colleagues, emergency services, anglers, voluntary groups, or multiple reports from different MOPs.

On occasions we will substantiate a report when there is no evidence of an environmental impact and assess the impact as a category 4. For example, if you self-report a newly identified unpermitted storm overflow which is not discharging at the time as required in GN21 Unpermitted storm overflows. However, in this example, you will need to self-report it again if a water discharge activity occurs. This would be substantiated and assessed as a minimum category 3 impact to the environment.

14.2 Always substantiate self-reported polluting discharges

We will substantiate a pollution incident if you self-report a polluting discharge to groundwater or surface water but refer to section [7 Discharges to land](#).

Wastewater assets self-report guide

15. Treated final effluent from WwTWs – EPR

15.1 Schedule 5 permit requirements for numeric limits

You must self-report permit non-compliances from a WwTW that **may** lead to significant pollution to the environment. You must comply with condition 4.3 and the requirements of Schedule 5. You should apply a precautionary approach to comply with this condition as the impact to the environment cannot be determined at the start of a pollution incident as described in section 6.2. Refer to sections [9.1 Introduction to Annex 1](#) and [Annex 1: Pollution incident self-report, notification or information](#) checklist for guidance on submitting the information required to comply with condition 4.3 and Schedule 5.

We set numeric limits for the quality of final effluent in permit conditions to protect the receiving water. There is potential for polluting discharges when the numeric limits are exceeded or breached.

Refer to section [8.3 EPR permits \(condition 4.3 and Schedule 5\)](#) for additional information about polluting discharges from sites that have an EPR permit. In most circumstances for LUT exceedances and numeric breaches you should provide information in Schedule 5 of your permit as specified in parts A(a) and A(b) and submit part B later. You may also need to provide information specified in part A(c).

Below is a list of some typical examples for when to self-report potentially polluting discharges for sites that have numeric limits. This list is not exhaustive.

15.2 OSM and UWWTR sample results

Self-report potential numeric non-compliances as described in this section as you receive the sample results. If you need to self-report a second parameter from the same prescheduled sample, you can send the additional information as an update to the master record. See section [9.8 New information in an update](#).

15.2.1 Look Up Table (LUT) exceedances

When you receive a sample result that indicates an LUT exceedance for a parameter from a prescheduled OSM sample, you should self-report this as specified in section [15.1 Schedule 5 permit requirements for numeric limits](#) and section [15.2 OSM and UWWTR sample results](#) and provide information listed in [Annex 1: Pollution incident self-report, notification or information](#) checklist.

There may be situations where you should self-report prior to receipt of OSM sample results, such as if you find a level of concern has been reached from operational samples, refer to section [15.3 Operational samples \(not OSM\) and level of concern](#).

As an LUT exceedance is not always breach of permit. We may categorise as category 4 if it is a short-lived exceedance and evidence to support it is submitted. This is not automatic, and a higher category may be applied depending on the circumstances, including duration and impact.

15.2.2 LUT failures

When an LUT failure has occurred, you should self-report this. Ensure it is clear in the self-report that it is an LUT failure. Refer to permit condition 4.3 and Schedule 5. You should confirm if the sample frequency will increase from reduced to normal in the self-report.

15.2.3 Maximum limit breaches

When a maximum limit has been breached you should self-report this. Refer to permit condition 4.3 and Schedule 5. You should also confirm if the sample frequency will increase from reduced to normal in the self-report.

15.2.4 Minimum limit breaches

Minimum limit breaches normally apply to pH only. You should self-report a permit breach to comply with condition 4.3 and Schedule 5.

15.2.5 Annual mean limit

If the sample result exceeds the annual limit specified in the numeric limit section of the permit you should self-report this to comply with condition 4.3 and schedule 5. Some permits contain changes to the annual limits. Check the effective date for changes of these limits where this may apply.

15.3 Operational samples (not OSM) and level of concern

You may monitor the water quality from the final effluent discharge point at a WwTW outside of the scope of pre-scheduled OSM samples.

You should self-report any findings from monitors or other sampling equipment when a parameter reaches a level of concern.

For a parameter with permitted limits, a level of concern is:

- twice the permitted LUT limit for sensitive receiving waters, see section [3.3 Sensitive receiving waters](#) or in low flow conditions such as during prolonged dry weather, see section [3.4 Low flows](#)
- or three times the permitted LUT limit in other circumstances
- or any reading above the maximum (or below the minimum) limits specified in the permit

You should also self-report operational sample results that indicate a level of concern where no numeric permit limit applies. For example, turbidity can be used as an indicator of suspended solids and overall water quality. You should use your operational knowledge of the works to assess whether turbidity levels are elevated to the extent that final effluent quality may be at a level of concern as described above.

Schedule 5, Part A(a) requires you to report any emission of a substance not subject to an emission limit that has caused, is causing, or may cause significant pollution. Part A(b) requires you to provide details of any samples taken and the associated results.

15.4 Visual observations (final effluent or inlet of WwTW)

You should self-report at the time you become aware, if you or a contractor working on your behalf, observes poor water quality when an OSM sample is taken from the final effluent sample point. Do not wait for the sample results. You should take photographs (time-stamped). You should consider taking operational samples of the discharge at the same time. The results can be compared with those from the OSM sample. It may be appropriate to take samples upstream and downstream of the discharge point at the same time as the OSM sample. If this is not possible, you should take another final effluent sample from the sample point (non-OSM) when you later take the upstream and downstream samples, so that there are samples taken at a similar time. Refer to [Annex 1: Pollution incident self-report, notification or information](#) checklist.

If the self-report from your visual observations leads to a numeric compliance issue from the OSM sample taken, you must self-report the OSM sample results to comply with permit condition 4.3 and Schedule 5. However, as the pollution incident is on record, you can submit the OSM sample results in an update. However, you must provide all the information specified in Schedule 5 to comply with the permit.

If following a self-report, the sample lab analysis later confirms it was compliant, the pollution incident would be category 4, not unsubstantiated, as there is evidence of what was reported.

If you observe poor water quality leaving site from the final effluent discharge point, outside of a pre-scheduled OSM sample, you should self-report it ASARP. You should follow the procedure described when visual observations are self-reported when an OSM sample is taken. Refer to Annex 1.

You should always share available site data relevant to the issue in the self-report or update and comply with the requirements in Schedule 5 of your permit.

If you observe an issue at the inlet of a WwTW, that may impact the final effluent water quality, you should self-report and investigate, as set out in section [11 Pollution incident response requirements](#). You should share water quality data available and any on site sample results, when they are taken from the final effluent discharge point. You should report the findings of your investigations ASARP.

15.5 No flow

If you find there is no discharge of final effluent during a prescheduled OSM sample visit, or during any routine checks, you should investigate the reason. There may be a legitimate reason, which you should provide as part of your usual “no flow” evidence submissions. Or you may need to investigate issues within the WwTW, or on the sewer network. You must self-report other water discharge activities that may occur elsewhere from the site or on the network and the reason for a “no flow” OSM sample.

15.6 Disinfection and UV day dose failures

Some WwTWs have tertiary treatment such as ultraviolet (UV) light or membrane filters to disinfect the treated final effluent.

You should self-report UV day dose failures in line with condition 4.3 and Schedule 5 of your permit. You should self-report on a precautionary basis to comply with the requirements of the permit and so that we can assess the impact.

A UV “day failure” is when no more than 10% of measurements taken consecutively during any 24-hour period from midnight to midnight fall below the 50% dose limit specified in the permit. This may occur because of an unplanned loss of power, or a mechanical failure for example. We will assess the impact from UV “day failures” based on the impact to human health and amenity.

Refer to section [6 When you may not need to self-report](#) for examples of when you may not need to self-report an issue. If your prompt investigations find there was a telemetry error or a data loss issue and you are confident the effluent was receiving UV treatment, you do not need to self-report it. You should keep records such as backup logs, manual readings and other relevant information about these types of issues. Information and evidence should be made available on request. If the issue recurs you should take action to resolve it to reduce the risk of a pollution incident in the future.

16. Storm overflows (SOs) at WwTW – EPR

Refer to section [30.6 Assets with an event duration monitor \(EDM\)](#) for self-report requirements in certain circumstances.

You must self-report storm overflows where FPF or PFF conditions are triggered, as these are specified limits in Table S3.1 of EPR permits and are subject to Schedule 5, Part A(b) requirements.

16.1 Non-compliant discharges from storm overflows

You must self-report a discharge from a storm overflow (SO) when it does not comply with permit conditions. This may include, but is not limited to:

- a non-permitted discharge type such as a release of crude sewage from a blockage
- a polluting discharge during non-storm conditions
- when the storm storage volume specified in the permit is not available
- when the storm tank contents were not returned as soon as reasonably practicable before the next rainfall event
- a blinded screen that causes a discharge from that SO, or a nearby one
- a polluting discharge identified through data where the flow passed forward (FPF), the pass forward flow (PFF) or full flow to treatment (FFT) is below the permit limit (refer to the sections below for further information)

You must include sufficient detail in your self-report, as specified in [Annex 1: Pollution incident self-report, notification or information](#) checklist to ensure you comply with permit condition 4.3 and Schedule 5 requirements.

16.1.1 Flow (FPF and PFF)

You must self-report a pollution incident where a storm overflow discharge occurs for at least 30 minutes and one of the following applies:

- flow passed forward or to treatment is 50% or less of the permitted FPF or PFF, or
- flow is above 50% and there is a visible or known environmental impact.

For purpose of self-reports, you should use EDM data to confirm when a discharge to the environment has occurred. You can disregard the first 15 minute EDM reading. A pollution incident should be recorded where the discharge continues for a further 30 minutes, confirmed by two consecutive 15 minute EDM readings.

As shown in [Table 1](#) below, the pollution incident starts at 15 minutes but the requirement to self-report is confirmed at 30 minutes.

Table 1 – Table showing when to self-report using EDM data

EDM reading from start of discharge	00:00	00:15	00:30	00:45	01:00
Time period	00:00-00:14.59	00:15-00:29.59	00:30-00:44.59	00:45-00:59.59	01:00-01:14.59
FPF/PFF ≤50%	Y (disregard)	Y	Y	Y	N*
EDM spill detected	Y (disregard)	Y	Y	Y	N*
Pollution incident		Start		End	
Trigger self-report			Y		

* N indicates that one or both conditions are not met: either FPF or PFF exceeds 50%, the EDM does not indicate a spill, or both.

If the discharge stops, or flow rate rises above 50%, before 30 minutes is reached, you are not required to self-report it and the assessment resets.

A pollution incident continues until there is a 24-hour period without an EDM discharge. Discharges separated by shorter gaps should be treated as a single incident.

16.1.2 Flow (FFT)

For sites that operate under full flow to treatment (FFT) conditions, the delay between the inlet flow and treatment flow means the timing approach for FPF and PFF cannot be applied directly.

You must self-report where:

- there is a visible or known environmental impact, or
- a discharge continues for at least 30 minutes (disregarding the first 15-minute EDM reading) and FFT remains at or below 50% of the overflow setting

In practice, this requires you to account for the time lag between the inlet and the FFT measurement point.

Where the FFT meter is x minutes downstream, you should compare this with EDM data over x + 15 minutes. If EDM shows a discharge for this duration and FFT remains below 50% over the same period, this indicates that FPF was below 50% for at least 30 minutes.

For example:

- if the FFT meter is around three hours downstream, and
- EDM shows a discharge while FFT remains below 50% for 3 hours and 15 minutes

You can conclude that FPF was below 50% for at least 30 minutes and a self-report is required.

A pollution incident continues until there is a 24-hour period with no EDM discharge. Discharges separated by shorter gaps should be treated as a single pollution incident.

16.2 Compliant discharges from storm overflows with an environmental impact

On occasions, you should self-report a pollution incident when a discharge from an SO **may** cause significant pollution, even if it is compliant with the permit conditions. This may include visual observations such as a visible plume or the release of rags or sewage debris, for example. The water discharge activity may be permitted but the screen dimensions are not fit for purpose. In this situation the permit may need to be varied and a new screen with smaller dimensions installed.

Members of the public may report water discharge activities from storm overflows that are compliant with their permits. In this situation the report will be recorded on our system by ICC, and we will assess compliance with the permit conditions. We may request data from you to enable us to do this. The water discharge may be compliant with the conditions of the permit, but there is an impact to amenity.

16.3 Storm overflow with storm tank(s) and EDMS

An EDMS (EDM storm) monitor detects the flow into the storm tank. If the FPF is not achieved and it is likely to lead to a non-compliant discharge from an SO or has led to a water discharge, you should self-report it. This may also apply if the storm tank has not been emptied ASARP and there is a discharge. You should submit EDM data, EDMS data, storm tank level data, FPF data, and other information we will require to assess compliance when you self-report it.

Refer to [9.5 Information \(I\)](#) for more information if the flow is intentionally directed to the storm tank(s).

16.4 Storm overflow from a Last in Line Overflow (LiLO) SPS

You must self-report a discharge from an SO sited at a last in line overflow (LiLO) connected to a sewage pumping station (SPS) if the discharge is not compliant with the permit conditions. Provide the appropriate amount of information for us to assess compliance in line with permit condition 4.3 and Schedule 5 of the permit.

17. Emergency overflows (EOs) at a WwTW or SPS – EPR

17.1 Consolidated in a WwTW permit or a separate SPS EO permit

Emergency discharges are permitted from Emergency Overflows (EOs) during an emergency, as defined in the EPR permit.

Refer to section [8.8 Electricity supply](#) for information about power supply issues.

You are required to self-report all discharges from an EO, whether they are compliant or non-compliant with the permit conditions. Crude sewage is usually discharged during an emergency, which will cause a pollution incident. Whilst the permit authorises the discharge, it has the potential to cause significant pollution. You should self-report all EO discharges as per condition 4.3 and Schedule 5.

Where appropriate we expect you to mitigate the environmental impact of the discharge in line with the SPS Key Protection Measures (KPM) in place. If the discharge is compliant with the emergency permit conditions and the KPM (if applicable), we will not record a permit breach for the discharge. Other permit breaches may apply if identified.

17.2 Emergency overflows acting as storm overflows

A discharge from an EO is not permitted if the discharge is rainfall dependent and not due to an emergency. The EO must be brought back into compliance within an agreed time frame. **Guidance Note GN021 Unpermitted storm overflows** (uSOs), details our permitting approach.

You must self-report all discharges from an EO in line with condition 4.3 and Schedule 5. If the EO has EDM, rainfall dependent spills may be able to be reported once if a duplication request and IAP is accepted – refer to section [30.6 Assets with an event duration monitor \(EDM\)](#).

18. Storm overflows on the network – EPR

For discharges from emergency overflows due to rainfall, refer to section [17.2 Emergency overflows acting as storm overflows](#).

Where you intend to apply for a permit, for an unpermitted storm overflow further to the investigations required in Guidance Note GN021 Unpermitted storm overflows (uSOs), refer to section [19 Unpermitted discharges from an SO or EO – EPR](#).

If an SO does not have direct links with a WwTW, it may have a pass forward flow (PFF) meter, rather than an FPF meter which should be referenced in the permit. The PFF should be achieved before the SO should operate. It is a non-compliant discharge if EDM detects a discharge to the environment and the PFF is not met. You should self-report this. Information should be provided to comply with permit condition 4.3 and Schedule 5.

18.1 Storm overflow from an SPS with a storm tank and, or a wet well

You should self-report non-compliant discharges from this type of asset. They are non-compliant if they discharge outside of permit conditions. There should be a flow meter for the PFF. You should self-report when the PFF is not met, the storm tank fills and EDM detects a discharge to the environment. Telemetry alarms in a wet well should notify you so that you can prevent a discharge.

19. Unpermitted discharges from an SO or EO – EPR

The following examples do not have an EPR permit but we expect you to apply the self-report requirements detailed in EPR permit condition 4.3 and Schedule 5 as stated in section [8.4 Consistent approach for all self-reports \(EPR and non-EPR\)](#).

19.1 Unpermitted storm overflows (uSOs) (GN21)

If there is a rainfall dependent discharge from an outfall that does not have an EPR permit to discharge storm sewage, this is an unpermitted water discharge activity. You should self-report polluting discharges from these outfalls. Schedule 5 requirements apply if the unpermitted SO discharges from an outfall that has an EPR permit to discharge a different type of discharge or under a certain set of circumstances, such as an EO permit.

Guidance Note GN021 Unpermitted storm overflows details our approach to legalise the water discharge activity. You must keep the register up to date, populate the columns regularly. From January 2026 you must self-report “known” as well as “newly identified” uSOs. We will consider duplication where appropriate, whereby at least one record per year is captured if an IAP is accepted. We expect you to mitigate pollution incidents while you investigate options for solutions.

If an EO operates as a storm overflow you should refer to [17.2 Emergency overflows acting as storm overflows](#).

19.2 Unpermitted emergency discharges

You must self-report if there is a water discharge activity because of an emergency when there is not an EPR permit in place. We expect you to take action to minimise any environmental impact.

20. Non-permittable discharge (not EPR) – sewer, rising main, surface water outfalls

20.1 Foul sewer or inspection chamber

You should self-report all water discharge activities from this non-permittable infrastructure, unless the groundwater exclusion applies, or the discharges can be recorded on the self-report or update for the main polluting discharge to surface waters, refer to section [6 When you may not need to self-report](#).

20.2 Rising main

Flow is pressurised in the rising main line, damage to this pipework has the potential to cause significant pollution to groundwater, surface water or land. You should self-report polluting discharges from rising mains, unless the groundwater exclusion applies, see [7 Discharges to land](#).

If there is an issue with a rising main which also causes an emergency discharge onto land or into surface water elsewhere, you should self-report that polluting discharge separately. The root cause may be the same, but as the polluting discharges will be from different asset types and at different locations, they cannot be recorded as one pollution incident or duplicated on our system.

20.3 Self-report polluting discharges from a surface water outfall (SWO)

If you observe or become aware of a polluting discharge from an SWO, such as sewage or another pollutant type, you should self-report it. If you are confident you are not the polluter, make this clear in your report to ICC so that we can investigate the pollution incident. Refer to section [1.5 Responsibility](#) about sharing information and joint investigations depending on the pollutant and polluter.

If you own the surface water line and suspect the pollution incident is within your remit to investigate and resolve, after you have self-reported it, you should investigate the polluter and resolve the issue. If a third party is responsible, you should share the relevant information with us, subject to GDPR.

Refer to section [24 Misconnections](#) for our expectations related to misconnections.

If the discharge from the SWO is due to an issue in your wastewater network, include this detail in your self-report. Refer to section [25 Dye tracing](#).

Water supply assets self-report guide

21. Treated process effluent discharge at WTWs – EPR

A water treatment works (WTW) may hold an EPR permit for a range of water discharge activities. Common examples include filter backwash, analyser wastewater, wastewater from the maintenance of granular activated carbon (GAC), and “run to waste” discharges.

If a discharge complies with the permitted quality limits, you do not need to notify us or submit a self-report.

21.1 Numeric permits

If the permit contains numeric limits and OSM sample results or other sampling required by the permit (e.g. run to waste samples) demonstrate a numeric breach, you must self-report

this. Refer to [Annex 1: Pollution incident self-report, notification or information](#) checklist for the information we need to assess the impact. You must comply with the requirements of EPR permit condition 4.3 and Schedule 5. You will need to submit the detail described in Part A(a) and A(b) as well as Part B.

Refer to section [15.1 Schedule 5 permit requirements for numeric limits](#) for more information.

Numeric breaches in WTW EPR permits are normally limited to minimum (e.g. pH) and maximum values. Look up table (LUT) exceedances and LUT failures do not apply to WTW permits with numeric limits.

21.1.1 Auto-analyser discharges

This section applies to public water supply auto-analyser discharges. It describes the decision-making process shown in flow chart [Annex 4C When to self-report a potable discharge from a water supply asset](#). The checks below must be considered in the order set out.

- Where the discharge is to land only, you should assess whether it meets the de minimis exclusion criteria. The de minimis exclusion is explained in [Groundwater activity exclusions from environmental permits - GOV.UK](#), relevant sections are 2, 2.7 and 2.8.
- Where the de minimis exclusion criteria are met, you are not required to self-report.
- Where the de minimis exclusion criteria are not met, you should self-report it.
- Where the discharge is not to land only, you should consider whether the discharge is permitted under the Environmental Permitting Regulations:
- Where the discharge is not permitted, you should self-report it.
- Where the discharge is permitted, you should assess whether it is compliant with the permit conditions:
- Where the discharge is compliant with permit conditions, you are not required to self-report.
- Where the discharge is not compliant with permit conditions, you should self-report it.

21.2 Operational samples

You may monitor the water quality from the discharge point outside of the scope of prescheduled OSM samples. If the operational sample results are higher than the maximum limit or lower than the minimum limit you must self-report your findings.

21.3 Visual observations (discharge point or inlet of WTW)

You should self-report if the appearance of the water discharge causes concern. Particularly if you suspect the water discharge is unlikely to comply with numeric limits in the permit. This includes during an OSM prescheduled sample visit, samples of 'run to waste' discharges and your observations during routine checks or maintenance operations.

You should self-report a malfunction of equipment which has, is or may cause a pollution incident as specified in Part A(a) of Schedule 5 and complete Part A(b) if you can share sample data. You should also complete part B.

You should use the checklist in Annex 1 when you submit a self-report and further updates, in the same way it will be referenced for wastewater polluting discharges.

21.4 No flow

If there is no discharge of final process effluent when you take a prescheduled OSM sample or otherwise, you should investigate why. If a discharge is not expected (e.g. there may be batch treatment processes onsite) you do not need to self-report this. If you expect a water discharge activity to take place but it is not, you should investigate and self-report any unpermitted discharges that may occur elsewhere at the WTW, to comply with permit condition 4.3 and Schedule 5.

22. Non-permittable discharges from the water distribution network

A non-permittable asset is one that could result in a water discharge activity, but we would not grant an EPR permit or WIA consent to allow it.

22.1 Water distribution assets

You may need to self-report water discharge activities from water distribution assets when they occur. The potable water transportation network does not have EPR permits that authorise water discharge activities. The treated water in this network can contain high levels of chlorine or other chemical residues from the water treatment process. Pipes on the distribution network are pressurised and if they burst, they can mobilise sediment.

Refer to section [8.5 Receptor types](#), section [7 Discharges to land](#) for extra information about when to self-report. Section [10 Evidence requirements](#) details the samples expected for potable water discharges.

There may be occasions when a member of the public reports a discharge that we may not consider a pollution incident, see section [3.5 Category 4, no environmental impact](#).

22.1.1 Discharges from stop-tap leaks

This section applies specifically to discharges originating from a stop-tap leak at a customer's property, where there is potential to enter surface waters for example via highway drains. It describes the decision-making process shown in flow chart [Annex 4C When to self-report a potable discharge from a water supply asset](#). The checks below must be considered in the order they are set out.

1. You should assess whether the discharge:
 - contains greater than 0.05 mg/l of chlorine, or
 - results in a visual impact at the receiving watercourse, or
 - causes suspended solids to be mobilised.
2. Where any of the above apply, you should self-report as a pollution incident.
3. Where none of the above apply, you do not need to self-report it.

22.2 Pumping station emergency discharges

Under some circumstances a discharge may be made in an emergency from a WTW without the benefit of an EPR permit. You should self-report them to us with an appropriate amount of information for us to assess any impact to the environment.

22.3 Untreated (raw) water

You should self-report water discharge activities from untreated water sources. It is likely that this type of water discharge activity will mobilise sediment and contain suspended solids. This type of water discharge activity is likely to have an environmental impact. Refer to [Annex 1: Pollution incident self-report, notification or information](#) checklist to for type of information you should submit for us to assess the environmental impact.

23. Water Industry Act (WIA) discharges

We issue WIA consents for discharges made from the water distribution and storage network, which includes discharges from reservoirs and service reservoirs.

23.1 Section 165 WIA

You do not need to apply for a consent from us if the water discharge is from a pipe less than 229 mm in diameter, but you must ensure you try to avoid or minimise the impact of any pollution during operations. The type of mitigation we expect is summarised below, in section [32 Mitigation measures](#).

You should provide information specified in [Annex 1: Pollution incident self-report, notification or information](#) checklist and state that the report type is that of a notification. You should provide ICC 48 hours' notice of the water discharge and specify how you intend to prevent pollution to the environment in your report. Include information such as how you will reduce chlorine levels in the discharge in your comms.

If your operations have an impact on the receiving environment, you should self-report this as a pollution incident. You should submit the appropriate level of detail prompted by the fields in [Annex 1: Pollution incident self-report, notification or information](#) checklist.

Refer to the series of Annex 4 flows charts: [Annex 4C When to self-report a potable discharge from a water supply asset](#) for more detail about the circumstances when you should self-report an issue.

23.2 Section 166 WIA

[You must apply for a consent](#) to discharge from a pipe, when the diameter exceeds 229 mm. Most Section 166 WIA consents are time limited.

Discharges from reservoir scour valves are typically undertaken for maintenance, testing, or emergency purposes. Consents for scour valve discharges are commonly granted for a 5-year period.

Before you discharge, you should [assess the risks](#) to identify potential environmental impacts and put appropriate mitigation measures in place to avoid or minimise those risks.

You must provide a minimum of 48 hours' notice before discharging, including details of:

- Asset type
- Nature and duration of the discharge
- Anticipated flow and volume
- Proposed mitigation measures

Further detail is set out in section [23 Water Industry Act \(WIA\) discharges](#).

23.3 Self-report requirements

If a discharge made under Section 166 results in environmental impact, you must self-report where:

- Mitigation measures fail to prevent an identified risk; or
- An unforeseen impact occurs.

You should also self-report where there is evidence of a measurable environmental impact, including (but not limited to):

- Sediment mobilisation extending visibly downstream beyond the immediate discharge point
- A measurable reduction in dissolved oxygen below expected levels
- Discolouration or turbidity persisting beyond the mixing zone
- Deposition of sediment on sensitive receiving waters (for example spawning gravels), refer to section [3.3 Sensitive receiving waters](#)
- Injury to or mortality of fish or other aquatic life

Short-term or localised impacts may still occur even where mitigation measures are in place. These do not automatically require a self-report, but you should err on the side of caution and report where there is uncertainty, or the impact is greater than anticipated.

Refer to Section [8.5 Receptor types](#) for further guidance on assessing environmental impact.

23.4 Operational expectations

You should:

- Monitor the discharge and its downstream effects where there is a reasonable risk of impact, particularly near designated or sensitive sites
- Postpone planned discharges where conditions are likely to increase environmental risk. For example, during prolonged dry weather or low flows (as defined in section 15.3)
- Review and adapt mitigation measures if impacts are greater than expected

23.5 Information requirements

Where a self-report is made, you must provide the information listed in [Annex 1: Pollution incident self-report, notification or information](#) checklist to enable assessment of the environmental impact.

Refer to Annex 4 for a guidance flows chart: [Annex 4C When to self-report a potable discharge from a water supply asset](#)

23.6 Mitigation measures

We expect your mitigation measures to include that:

- the discharge does not contain suspended solids or polluting substances as reasonably practicable
- the discharge does not scour or erode the bed or channel of the receiving watercourse
- the discharge does not flood or cause damage to railways, canals, highways or downstream stretches of watercourses
- the chlorine levels in the discharge do not exceed around 0.05 mg/l
- you stop the discharge if any adverse effects are observed in the receiving watercourse

Other types of pollution incidents

24. Misconnections

24.1 Your responsibilities and initial actions

For misconnections from surface water outfalls (SWOs) you manage, you should:

- self-report a misconnection directly reported to you or you identified through routine operations
- confirm pollution pathways, for example using dye tracing or CCTV surveys, refer to [25 Dye tracing](#)
- investigate whether the source is one of your assets, for example by:
 - checking upstream assets for evidence of discharges (EDM data or visual evidence)
 - dye tracing nearby sewers to identify defects
- identify the source of the pollution and the responsible party or parties and share this with us so we can assign the polluter and take appropriate action
- take action to stop the pollution as soon as possible
- provide regular updates throughout the investigation
- work collaboratively with partner organisations and customers to resolve the misconnection.

See section [20.3 Self-report polluting discharges from a surface water outfall \(SWO\)](#).

You must investigate and resolve misconnections in a timely manner. If you cannot confirm the source within the timescales set out in [Annex 3: Time frames for pollution incident](#) correspondence, the pollution incident will remain attributed to you.

24.2 Self-reports, requests to duplicate or review polluter

You must self-report all relevant pollution incidents, including repeat reports about the same outfall.

Where multiple reports relate to the same ongoing issue, you may request to duplicate where the criteria in section [30 Request to duplicate](#) apply. Continuous discharges may be treated as duplicate records, see section [2.2 A duplicate report](#).

Where local action plans are in place, we do not normally expect Incident Action Plans (IAPs) for misconnection investigations. However, an IAP will be relevant if you request to duplicate or if you consider there is a risk of repeated reports (for example, from members of the public).

In most cases, evidence of misconnected properties should be provided as part of your final self-report, which would be within 14 days, or up to 60 days where an extension is agreed.

Requests to review or amend the recorded polluter should therefore only be made in exceptional circumstances, where the evidence provided in your updates or final report has not been accurately reflected. We may not reopen incident records after data is finalised at the end of February for the previous calendar year. See section [29 Third party polluter](#).

24.3 Investigations that span two calendar years

Most misconnection investigations should be completed within the normal 14-60 day window and therefore be within a single calendar year. However, by exception (for example late in the calendar year reports or complex investigations), cases may span more than one calendar year. We do not expect investigations to extend beyond two years.

In the situations above, we may close the incident record in the first calendar year as “unidentified third party” as long as you:

- supply evidence that your asset is not the source
- demonstrate that you are making reasonable progress with the investigation
- self-report a new pollution incident for the following calendar year if pollution continues (this will be assigned to you as the polluter until sufficient evidence is provided to identify a specific third party)

Closure as “unidentified third party” in a second year will only be accepted by exception, for example where pollution is short-lived and you can provide evidence that appropriate and timely investigation has been carried out.

24.4 New or recurring misconnections

If pollution continues or a new misconnection affects the same SWO:

- you must self-report a new pollution incident for each calendar year
- you must repeat the investigation and reporting process

If pollution recurs after previously identified misconnections have been resolved, this must be treated as a new pollution incident.

25. Dye tracing

25.1 Use of dye

You should use dye responsibly to minimise any impact on the environment. Before using dye, you should check for any downstream activities or amenity use that could be affected and consider whether it is appropriate to proceed.

25.2 Pollution incident investigation

Where dye tracing forms part of an ongoing investigation linked to a previously recorded pollution incident, you should let us know about the dye tracing via an update to the existing incident record.

If you provide this information, it helps us understand your activity and respond to any enquiries from the public. This may be appropriate during a misconnection investigation [24 Misconnections](#), although it could apply to other pollution incident types.

25.3 Public reports of discolouration

If we receive a report of discolouration in a watercourse from a member of the public, we will log this on our system and assess the impact as we will not know at the time of the report what is causing the discolouration.

If we establish the discolouration is from dye tracing, we will assign the incident record to whoever is carrying out the work and assess the impact on amenity. Dye tracing is unlikely to have a water quality impact unless it is used in significant excess.

25.4 Link and assign pollution incident records

If you undertake dye tracing and identify the original source of pollution, you should provide the details of the responsible third party. The dye tracing report can then be linked to the master pollution incident record.

25.5 Dye tracing outside of pollution investigations

If you carry out dye tracing for reasons unrelated to a pollution investigation, you could submit an information report to tell us about your activity. This will not be logged as a pollution incident.

26. Flooded assets

26.1 Definition

You should refer to section [8.7 Extreme weather](#) and when to self-report polluting discharges from flooded assets.

Flooded assets are when infrastructure you are responsible for is submerged and malfunctions. Polluting discharges become uncontrollable due to extreme flooding. This includes from treatment works, pumping stations and other network infrastructure. These events may result from severe storms, fluvial flooding, groundwater rises, or coastal surges that exceed your reasonable capacity to prevent or manage pollution.

26.2 After a flood event

After a flood event ends, you should:

- inform us once an asset is fully restored
- submit an IAP if restoration is delayed, refer to section [31 Incident Action Plans](#)
- be aware that our records may reflect restoration progress

Requests to review, duplicate and IAPs

27. Review principles

27.1 Our responsibilities

Under the [Regulators' Code](#) we must ensure we have clear information and guidance to demonstrate our regulatory approach is transparent. We are also required to provide a route of appeal if you disagree with our regulatory decision.

27.2 Review requests are the exception

You should self-report accurate and timely information so we can assess the impact of a pollution incident and identify the correct polluter. A request to review our decision should be a rare occurrence. You should not treat them as routine.

27.3 When to submit a request to review

You must submit a request to review within 14 days of us confirming the pollution incident assessment. This confirmation will be provided in writing such as when we send regular pollution incident datasets. See [Annex 3: Time frames for pollution incident](#) correspondence.

If you submit requests promptly it will help us to review contemporaneous evidence and allows further information to be gathered within a timely manner.

You should only submit a request to review when you can provide clear evidence that supports a change to our records. This may include identifying a:

- different impact category, see section [28 Review the impact category](#)
- different polluter, see section [29 Third party polluter](#)

You can also request that we duplicate recurring pollution incidents where they meet the criteria, see section [30 Request to duplicate](#).

27.4 How to submit a request to review

- If we have agreed a process with you, use that to submit your request
- If we do not have a process in place, contact the Lead Officer directly.

27.5 Timeliness

Share evidence promptly, ideally before we complete our assessment and close the pollution incident record. Refer to [Annex 3: Time frames for pollution incident](#) correspondence.

27.6 Our approach

To keep the process transparent and robust, we will:

- allow a reasonable time frame for you to contact us
- apply timescales strictly
- reject review requests if evidence is insufficient or any of the criteria are not met

27.7 If we reject your proposed change

We will explain our decision. You may escalate the review if you disagree with our conclusion and have strong supporting evidence to support it.

27.8 Final decision

If the escalated review also rejects the change request, our decision is final.

27.9 Annual cut-off

All requests for review and any subsequent escalations must be submitted and resolved by 28 February following the reporting year. This is required to ensure that pollution incident data is finalised in advance of our environmental performance reporting, and to enable water companies to prepare their Pollution Incident Reduction Plans and Implementation Reports. Requests received after this date will not normally be considered.

27.10 Missed time frames

If you do not provide evidence within the agreed time frame, we will categorise the pollution incident and assign the polluter based on the available evidence.

28. Review the impact category

28.1 Category 1 and 2

If we categorise the impact of a pollution incident as category 1 or 2, we may review our decision where you provide additional evidence that may indicate that the environmental impact was lower than the original assessment.

28.2 No review option for category 3

Where we have assessed the impact from a discharge to groundwater or surface water as category 3, do not submit a request to review our assessment. We will consider most water discharge activities into the environment to have at least a minimal impact.

28.3 Impact categories

If we decide to alter the category on a pollution incident record, such as a downgrade to the impact on water quality, you should be aware that other impact categories, such as amenity or ecology may remain unchanged. Each impact category is assessed independently, and a change for one receptor does not automatically alter others.

29. Third party polluter

29.1 Our approach

For guidance on misconnections, see section [24 Misconnections](#).

Where a pollution incident from your asset is caused by a third party, we can assign the polluter as the third party. However, there is a stringent test for assigning responsibility.

You may remain responsible depending on the circumstances of the pollution incident and the principles set out below.

We will assess each case on its merits, based on the available evidence.

By exception, where there is sufficient evidence that a third party caused the pollution incident but cannot be identified, we will record the polluter as “unidentified third party”.

You must carry out a suitable investigation to identify any third party polluter.

If you consider a third party to be responsible, you should provide this information within 14 days of the self-report. You may request an extension, refer to [Annex 3: Time frames for pollution incident](#) correspondence.

If new evidence becomes available after we complete our assessment, you may request a review of the identified polluter within 14 days of our confirmed assessment (emailed data tables).

29.2 Evidence of third party

As part of your self-report and update, as set out in [Annex 1: Pollution incident self-report, notification or information](#) checklist, you must provide evidence to demonstrate third party responsibility and the circumstances to allow us to assess foreseeability.

In addition to evidence expectations set out in section [10 Evidence requirements](#), evidence of third party should include, but is not limited to:

- third party details, so we can investigate, consider enforcement and cost recovery under the polluter pays principle
- measurements of relevant objects and sewer dimensions
- summary of related pollution incidents and any actions taken, for example details of sewer misuse campaigns, including dates and coverage
- correspondence or action taken and planned against the third party, including enforcement
- for domestic surface water misconnections, evidence confirming source and pathway, see section [24 Misconnections](#).

29.3 Pollution incident records

We will decide how the pollution incident is recorded on our system. This does not determine legal liability, cost recovery or enforcement action.

We may still record permit non-compliance on a Compliance Assessment Report (CAR) and take enforcement action against you, even if a third party is involved. In some cases, responsibility may be shared between you and a third party.

29.4 Responsibility criteria

You remain responsible where the pollution incident:

- could have been anticipated, prevented, or mitigated through your reasonable intervention, including where it arises from trade effluent consents you authorise, see section [4.3 Trade effluent consents](#)
- is a common feature of water industry operations

A third party will only be considered responsible where the discharge was unanticipated and unforeseeable to an extraordinary degree, for example vandalism.

29.5 Foreseeable items

Items commonly found in the sewerage system are considered foreseeable. You are expected to have systems in place for asset maintenance and public engagement to prevent sewer misuse.

You should not submit requests to review the accountability for a polluting discharge involving (but not limited to) the following items, as these will not be accepted:

- drainage rods (domestic or industry)
- fats, oils, and grease

- toilet paper
- sanitary items (for example nappies)
- wet wipes, including biodegradable
- screwdrivers
- drink bottles and cans
- tree roots
- stones
- items that can be flushed down a toilet or enter a highway drain

These items arise from normal sewer use, are considered common features of water industry operations and sewer misuse and should be managed through proactive maintenance and education. Other third-party items typically found in sewers may be added to this list. Polluter review requests relating to other similar items may also be rejected.

29.6 Object size and relevance

The size of the object is relevant when we assess third party responsibility, particularly in relation to the sewer diameter. We will reject requests where the object is small relative to the sewer.

29.7 Unforeseeable to an extraordinary degree

We recognise that some incidents may be genuinely unforeseeable. In such cases, you must provide clear evidence as set out in section [29.2 Evidence of third party](#).

29.8 Loss of power

Power loss includes transient power interruptions (power blips), voltage fluctuations (includes surges and brown outs), and complete power outages (black outs), all of which can affect assets and lead to a pollution incident.

You will remain responsible for the pollution incident where it was foreseeable and could have been anticipated, including where:

- the pollution incident was caused by a planned power outage or interruption, or by a known electrical condition that presented a foreseeable risk
- the permit (including pumping station key protection measures) requires standby power provision, and this was not in place
- a pollution incident caused from a loss of power, has occurred previously from the same asset

Where this is the first occurrence and none of the above apply, we may consider assigning responsibility to the power company, provided you submit sufficient evidence that the power loss was the primary cause.

As a minimum, you should provide the following evidence:

- a report from the electricity network operator confirming the duration and extent of the power loss
- telemetry data from the affected asset that shows when power was lost and restored

- details of your response time and actions taken

We will assess each case on its merits, based on the evidence provided.

30. Request to duplicate

30.1 Our approach to requests to duplicate

Duplicating pollution incidents records is intended to manage self-reports about minor, recurring pollution incidents while medium-long term resolution is delivered. A recurring pollution incident is defined in section [2.3 A recurring pollution incident](#).

We may agree to record future reports of a recurring pollution incident as duplicates of the master record when the pollution incident meets the duplication criteria and we have accepted the proposals submitted in an Incident Action Plan (IAP), see [31 Incident Action Plans](#).

For assets with EDM that monitor discharges of storm effluent, there is specific guidance for duplication and expectations for self-reports, in section [30.6 Assets with an event duration monitor \(EDM\)](#). If this does not apply, we expect you to self-report each polluting discharge, as described throughout the guidance.

We will not duplicate pollution incident records:

- for pollution incidents that have a serious or significant impact (category 1 or 2)
- retrospectively (we will only duplicate pollution incident records that occur following the date we accept the duplicate request and IAP)
- in most cases during planned works, where you are expected to prevent pollution; however, there may be circumstances where all reasonable actions have been taken and a residual risk of discharge remains

If we accept your request to duplicate:

- we will link future pollution incidents to the master record
- we will continue to duplicate records until the final planned action completion date. This may not extend to the actual completion of the action if there are delays, so you would need to agree an action extension before the timeframe passes under those circumstances.

If we agree to a duplicate request and accept proposals in the IAP, it does not limit our enforcement response. We may take enforcement action in line with our [Enforcement and sanctions policy](#).

30.2 When to request to duplicate

It is your decision whether and when to submit a request to duplicate. If you know from the outset that you intend to request to duplicate, you should state this in your self-report, as set out in [Annex 1: Pollution incident self-report, notification or information](#) checklist.

30.3 Duplication criteria

To request that future pollution incidents are duplicated to the master record, you must submit an IAP (see section [31 Incident Action Plans](#)) and provide evidence **all** the following criteria are met:

- The pollution incident is ongoing or likely to recur
 - the root cause cannot be resolved promptly
 - further pollution incidents are likely to occur before resolution
- The pollution incidents are related
 - they will arise from the same underlying issue
- The pollution incident occurs from the same location, asset or site
 - all pollution incidents originate from the same site, asset or outfall
- The pollution incidents share the same root cause that cannot be resolved through routine maintenance
 - the same root cause(s) applies across pollution incidents
 - issues that can be addressed through planned maintenance should be resolved without delay. We will not duplicate pollution incidents when you carry out planned maintenance, we would expect you to mitigate pollution under these circumstances. Planned maintenance activities that can be addressed quickly may include de-silting or removing tree roots, relining pipework, or replacement of mechanical parts
 - minor repairs should be completed quickly, while major upgrades may take longer.
- The environmental impact remains minor (category 3)
 - there is no evidence the impact will escalate to a major (category 1) or significant (category 2) impact
 - all receptors must be considered, refer to section [8.5 Receptor types](#)
 - changes in conditions (such as low flow, as defined in section [3.4 Low flows](#), or prolonged duration) may increase impact
 - where a serious impact (category 1 or 2) occurs, you must self-report it as a separate pollution incident. You should update the IAP to include your actions and mitigation measures.
- Mitigation measures are in place or planned to minimise impact
 - mitigation is implemented or planned to minimise the impact on receptors
 - measures remain effective until the root cause(s) are resolved
 - by exception, where mitigation is not possible, you must explain why for us to consider a request to duplicate
 - for further information, see section [32 Mitigation measures](#).

30.4 Managing duplication, reports and request to escalate

If we accept your request to duplicate, you must:

- deliver all actions set out in the IAP within the agreed timescales
- keep the IAP up to date

If actions are not completed, or mitigation is ineffective, we may:

- stop duplication, and
- record each polluting discharge as a separate pollution incident

If we reject a duplication request:

- we will explain the reasons why
- you may request to have our decision escalated for peer review, where you have strong supporting evidence that we should accept your request
- if the escalated request is rejected, our decision is final

See [Annex 3: Time frames for pollution incident](#) correspondence.

If we attend a site in response to a pollution incident report, for example where we have information or evidence that indicates the impact to the environment may be more than minor:

- that pollution incident will not be treated as a duplicate
- it will be recorded separately to reflect our investigation resource, in line with the Polluter Pays principles

30.5 Duplication across calendar years

Duplicating recurring pollution incidents does not carry across calendar years. If pollution incident recurs into a new calendar year:

- you must self-report in the new calendar year when the polluting discharge first recurs
- at least one pollution incident must be recorded each calendar year
- we will reconsider duplication based on updated evidence and an active, updated IAP

30.6 Assets with an event duration monitor (EDM)

This information in this section only applies to storm discharges from storm overflows and outfalls with EDM which monitor rainfall dependent discharges from emergency overflows. It does not apply to genuine discharges made in an emergency. See section [17 Emergency overflows \(EOs\) at a WwTW or SPS – EPR](#).

Where an EDM is installed, they record all discharges to the environment which includes short-duration events. Some of these discharges may comply with permit conditions, while others may not. It is not always appropriate to self-report each individual non-compliant discharge via ICC.

When we agree to duplicate pollution incidents from an asset with EDM, we will agree with you how you should record and report subsequent polluting discharges. This will include the frequency of reports, whether it will be via the IAP or through self-reports to ICC that link to the master pollution incident record. We must ensure that we have clear records of the total number of polluting discharges.

For storm overflows identified as part of the GN021 Unpermitted Storm Overflows project or those classified as per GN066 How to Classify Storm Overflow Performance, their inclusion on a programme tracker alone is not sufficient to meet duplication criteria. You

must still submit an IAP and demonstrate that the criteria in section [30.3 Duplication criteria](#) are met.

For unpermitted and permitted storm overflows, we expect duplication requests and IAPs to include:

- short-term maintenance actions and mitigation measures
- evidence that GN021 and GN066 processes are being followed within the required time frame
- programme tracker updates
- dates for performance classification
- dates for completion of an Urban Pollution Management (UPM) study

Permitted emergency overflows do not follow the GN066 process, their IAPs should detail how you will return to compliance. Refer to section [17.2 Emergency overflows acting as storm overflows](#).

30.7 Reasons we may accept a request to duplicate

We may duplicate pollution incidents in the following circumstances:

- where complex investigations are required, such as when there may be multiple contributing factors or large catchments
- where access constraints apply, such as when the location requires significant planning to access it like busy highways, railways, or remote or hazardous locations
- where long-term investment is required to resolve the root cause, including planned maintenance and enhancement activities, such as
 - groundwater infiltration
 - hydraulic overload
 - surface water or saline intrusion.

31. Incident Action Plans

An Incident Action Plan (IAP) should set out your actions with time frames for completion to explain how you will investigate, mitigate and manage pollution incidents, particularly where they are ongoing or likely to recur before full resolution.

31.1 When to use

We do not expect IAPs for all pollution incidents. In most cases, you should identify and resolve the root cause(s) promptly so that repeat or ongoing discharges are limited. Where effective mitigation measures are in place, an IAP is not necessary.

The circumstances when IAPs are mandatory and optional are detailed below.

31.1.1 Mandatory use

An IAP must be submitted with any request to duplicate, see section [30.1 Our approach to requests to duplicate](#).

31.1.2 Optional use

An IAP can be used voluntarily, or in agreement with the Lead Officer, to record and share planned actions for a standalone pollution incident. Examples include:

- catchment investigations (for example, misconnections)
- capital or maintenance works, including NEP
- following a category 1 or 2 pollution incident
- any other situation where planned and completed actions need to be documented

31.2 Content and requirements

Your IAP should:

- be completed in full using this template [Annex 2: Incident Action Plan and duplicate request](#) template
 - only enter text in the white cells on the water company tabs (refer to the “how to use” tab within the template)
 - provide all required information as set out in the template
 - specify short-term (0–6 months), medium-term (6–12 months) and long-term (12 months+) actions, including completed actions where relevant
 - describe your response to each pollution incident, as agreed within the IAP
 - record each polluting discharge, including those where it is not appropriate to self-report each discharge to ICC, refer to section [30.6 Assets with an event duration monitor \(EDM\)](#)
- be owned and signed off by a budget-holding manager
- be kept up to date, with revisions submitted when actions are completed or timescales change (acceptance is not guaranteed)
- address maintenance issues promptly to reduce pollution while long-term solutions are implemented

31.3 Submission and review process

You should send IAPs to the pollution incident Lead Officer and copy in the Environment Team inbox.

We will carry out an initial review and may return the IAP to request additional information. Once all required information is provided, we will assess the IAP and either:

- accept it, or
- reject it, with reasons

We will return the IAP following our decision.

31.4 File naming convention

Use the following format: IAP-[Year]-[Site identifier]-[Version]

Where the site identifier is one of:

- EPR permit reference

- unpermitted storm overflow unique reference
- WIA consent number
- site name (if non-permittable)

Examples:

- IAP-2026-AB123456-V1
- IAP-2026-Bridge St foul sewer-V2

31.5 Duration and expiry

IAPs will remain valid until the planned completion date of the final action.

For duplication purposes, this is the point at which duplication would normally cease, subject to the requirements set out in section [30.5 Duplication across calendar years](#).

32. Mitigation measures

Short term mitigation (to prevent or minimise polluting discharges) can be completed or planned with delivery within 0-6 months of the IAP submission. It is about optimising the performance of the asset whilst investigations and solutions are designed and delivered.

You should monitor mitigation measures to confirm they remain effective and take action where they do not.

Mitigation actions can include (but are not limited to):

- increasing or bringing forward maintenance e.g. sewer cleansing, sewer re-lining, desludging tanks
- installing monitors e.g. EDM on an unpermitted SO (uSO)
- planning and conducting CCTV surveys
- reducing inflows into the sewer whilst schemes are being designed to remove more significant amounts of infiltration
- adjusting settings on assets to delay discharges or increase storage, even if this is to a small degree
- waiting for drier weather to undertake works.

It is not always about tankering waste off site, although this may be an option or part of an option in some situations.

In almost all cases there are short term actions you can take to mitigate or minimise pollution. If you have already completed short-term mitigation, record those actions in the IAP. By exception, we may consider accepting a request to duplicate if there are no short-term mitigation actions possible. But you need to explain what mitigation has been considered and justify why it is not feasible.

Annex 1: Pollution incident self-report, notification or information checklist

See separate Excel document, version 2.

Annex 2: Incident Action Plan and duplicate request template

See separate Excel document, version 2.

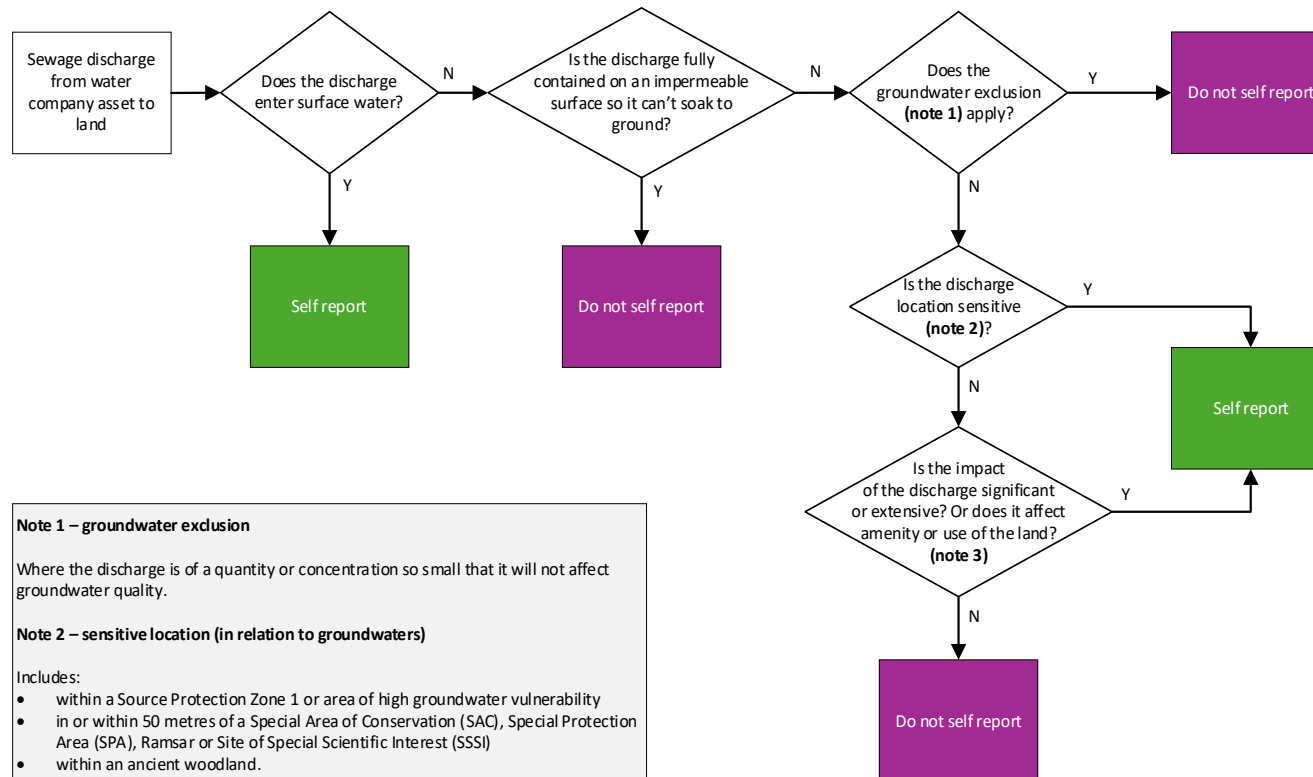
Annex 3: Time frames for pollution incident correspondence

Who	Task	Time frame
Initial report		
You	Self-report potential or actual pollution incidents	As soon as reasonably practicable (ASARP), no later than 24 hours
Us	Log pollution incident report and carry out initial assessment	Within 1 hour
Us	Notify you about pollution incident reports we receive or create that may relate to your assets or activities	Promptly
Information sharing and assessment		
You	Submit evidence as specified in Annex 1: Pollution incident self-report, notification or information checklist and section 10 Evidence requirements	ASARP (maximum 24 hours)
You	Provide timely updates in line with the detail expected in Schedule 5 part A	Final update within 14 days
You	Submit extension request within 14 days of notification	Extensions may be accepted up to 60 days
Us	Confirm whether extension request is accepted	ASARP
Us	Confirm incident category and assign the record to you. Complete assessment	Usually within 30 days of notification, subject to any agreed extensions

Who	Task	Time frame
Request a review		
You	Submit review request (category or polluter)	Within 14 days of receiving our confirmed assessment (emailed data tables)
Us	Lead officer reviews your request and additional evidence. We will notify you of the decision, with reasons	Within 14 days of receiving the request and evidence
Submit an Incident Action Plan (with or without a request to duplicate)		
You	Submit Incident Action Plan	ASARP
Us	Review IAP and confirm if IAP (and request to duplicate if relevant) is accepted	Within 14 days of receiving the IAP (and the request to duplicate if relevant)
Escalate a rejected request to review or duplicate		
You	If you want to challenge our decision, contact the lead officer to escalate it for a peer review	Within 14 days of us confirming our decision
Us	Carry out a peer review. Confirm outcome and provide reasons if we reject it. End of review process	Within 14 days of the request
Pollution incident record closure		
Us	Update the incident record with our final assessment and close	Within 30 days. By exception, this may be extended up to 90 days or until the end of February for pollution incidents from the previous calendar year (whichever is sooner)
You	Submit information about how you will prevent a recurrence (Schedule 5, part B)	ASARP

Annex 4: Flow charts to support interpretation

Annex 4A When to self-report a sewage discharge to land



Note 1 – groundwater exclusion

Where the discharge is of a quantity or concentration so small that it will not affect groundwater quality.

Note 2 – sensitive location (in relation to groundwaters)

Includes:

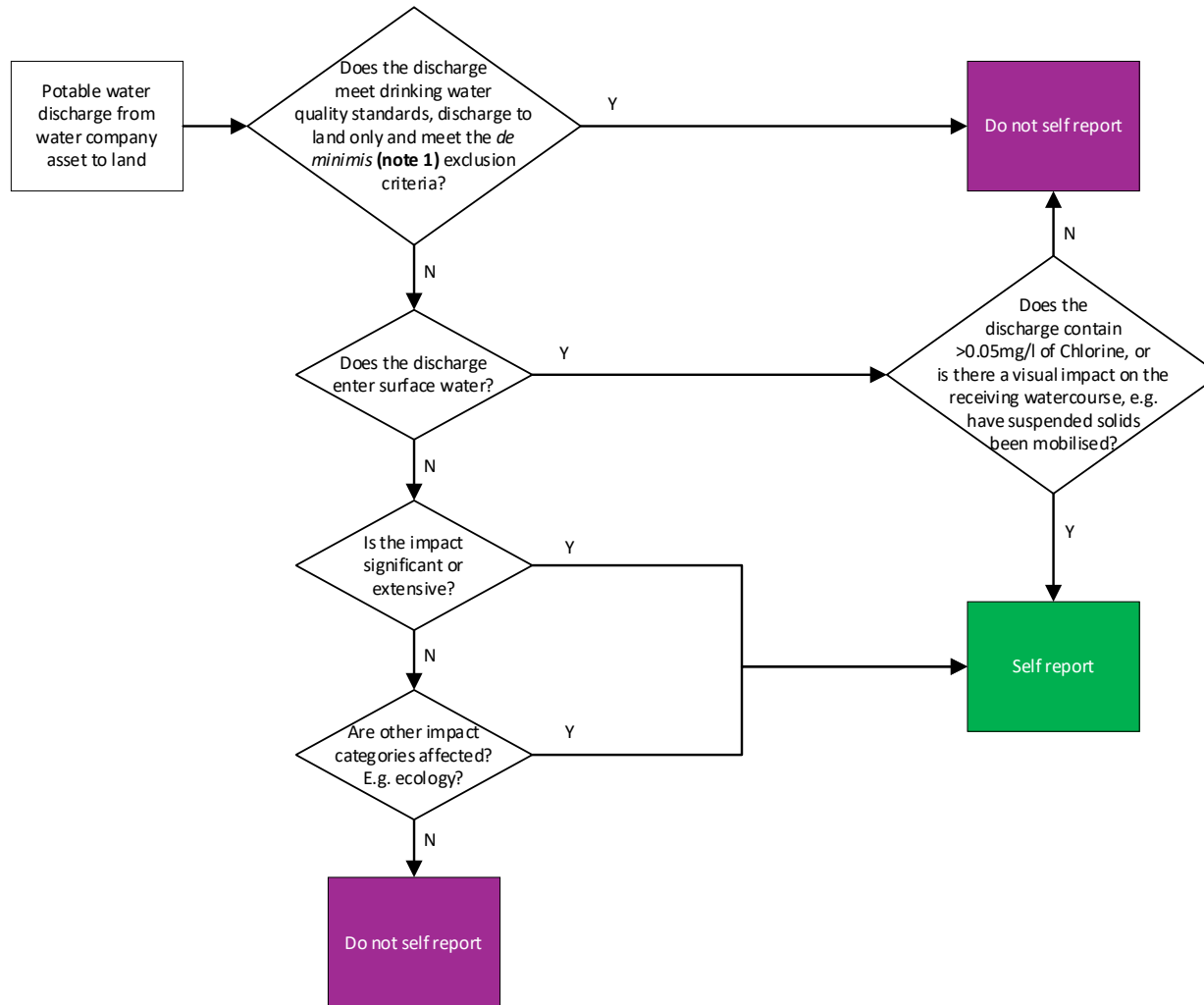
- within a Source Protection Zone 1 or area of high groundwater vulnerability
- in or within 50 metres of a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar or Site of Special Scientific Interest (SSSI)
- within an ancient woodland.

Note 3 – significant/extensive, amenity/use of land

Amenity impact examples include: parks, sports fields, footpaths, aesthetic impact e.g. sewage debris, public spaces and events

Use of land affected e.g. agricultural activity affected such as livestock or crops

Annex 4B When to self-report a potable discharge to land



Note 1 – *de minimis* exclusion criteria

Link: <https://www.gov.uk/government/publications/groundwater-activity-exclusions-from-environmental-permits/groundwater-activity-exclusions-from-environmental-permits#de-minimis>

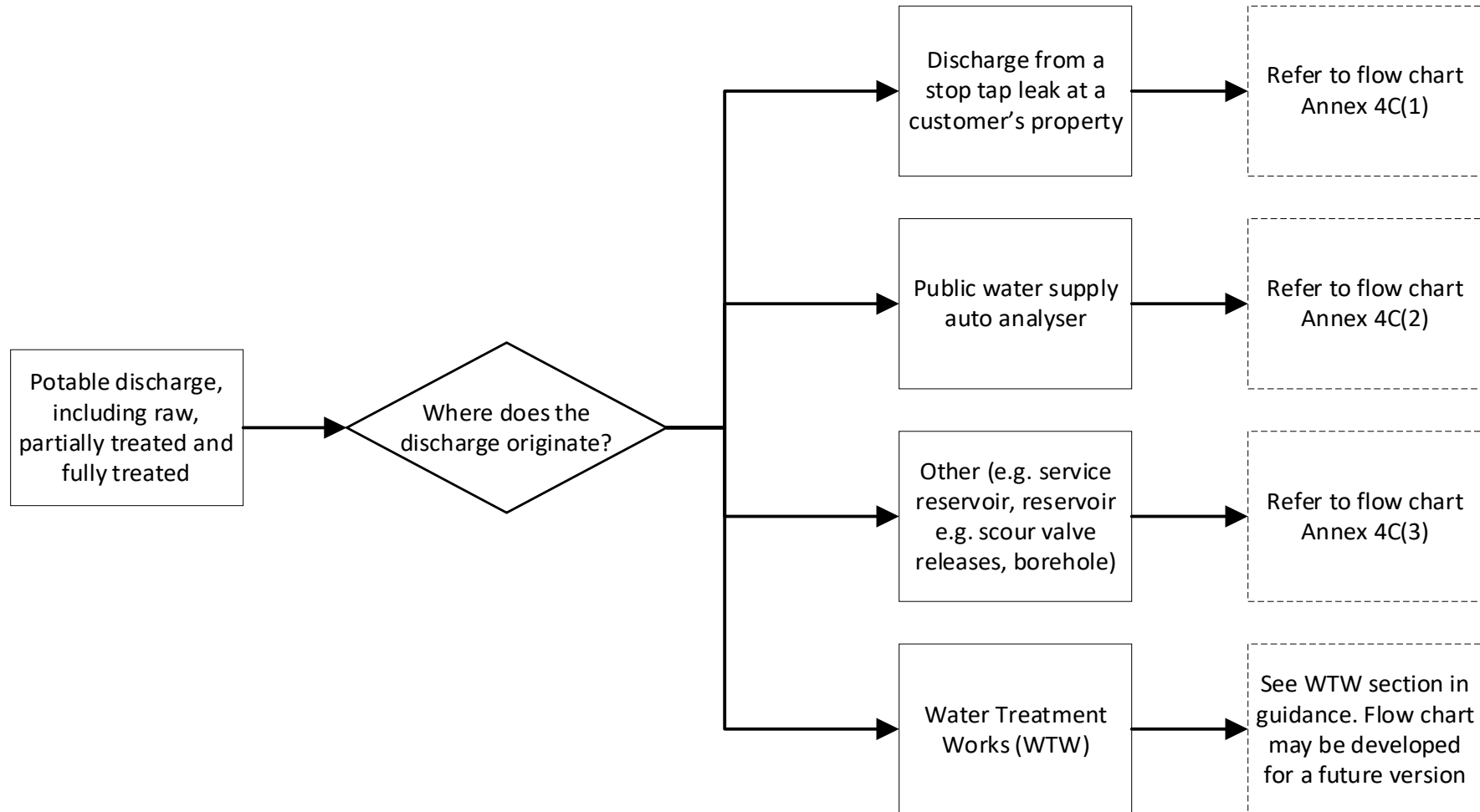
Relevant section:

2.7 Discharge onto ground of groundwater that meets drinking water quality standards

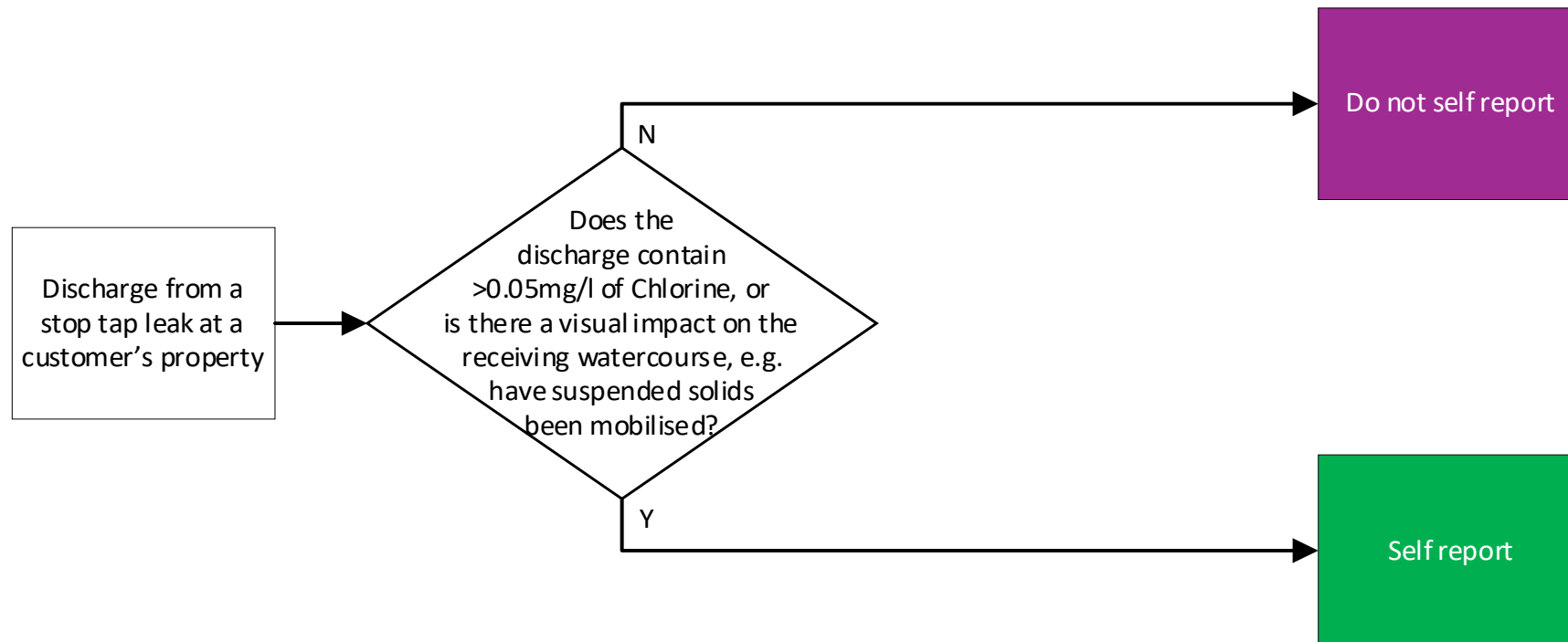
You can discharge groundwater that meets drinking water quality standards onto ground when the:

- discharge activity is temporary and is for a maximum duration of 30 consecutive days
- quality of the groundwater is either naturally at drinking water quality standards, or is groundwater of mains quality that has been treated to drinking water quality standards
- location (ground) where the discharge is to occur is free from any obvious sources of contamination
- volume and rate of discharge will not cause pollution or any other adverse environmental impacts, including flooding, to the underlying groundwater or any adjacent surface waters (rivers, streams) or habitats

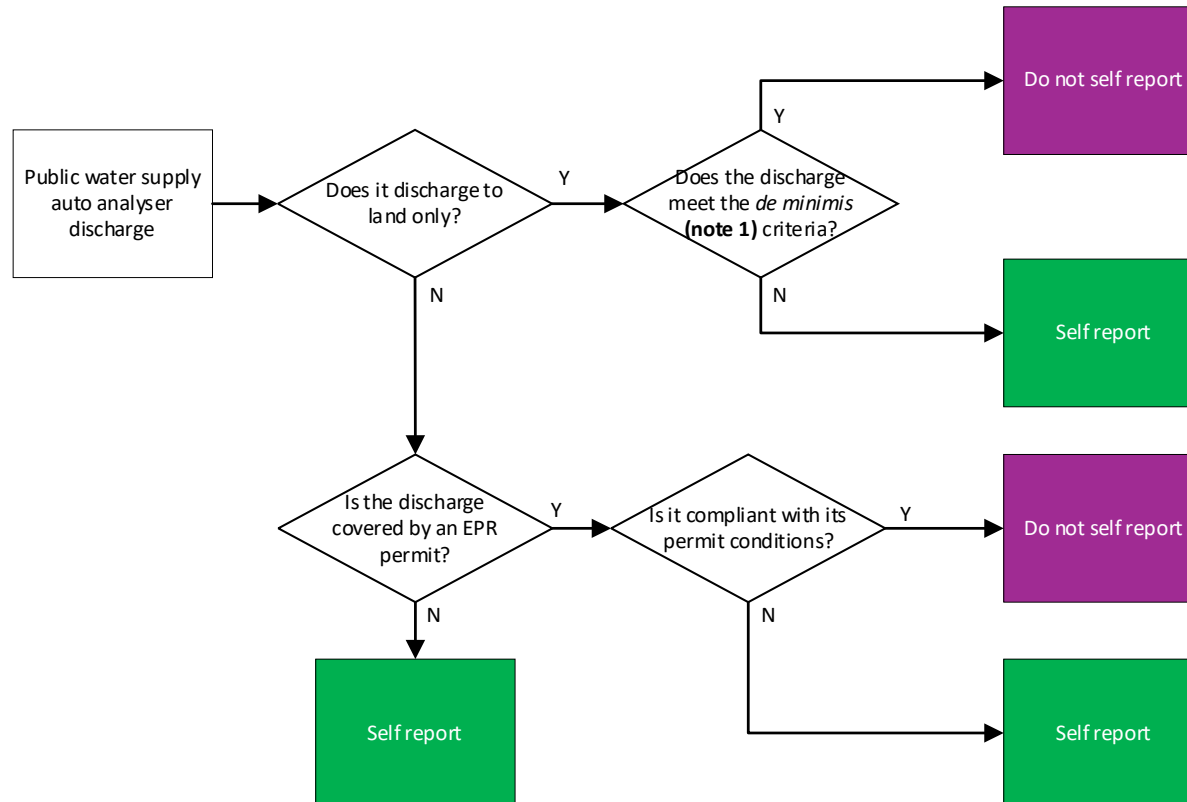
Annex 4C When to self-report a potable discharge from a water supply asset



Annex 4C(1) Discharge from a stop tap leak at a customer's property



Annex 4C(2) Public water supply auto-analyser



Note 1 – *de minimis* exclusion criteria

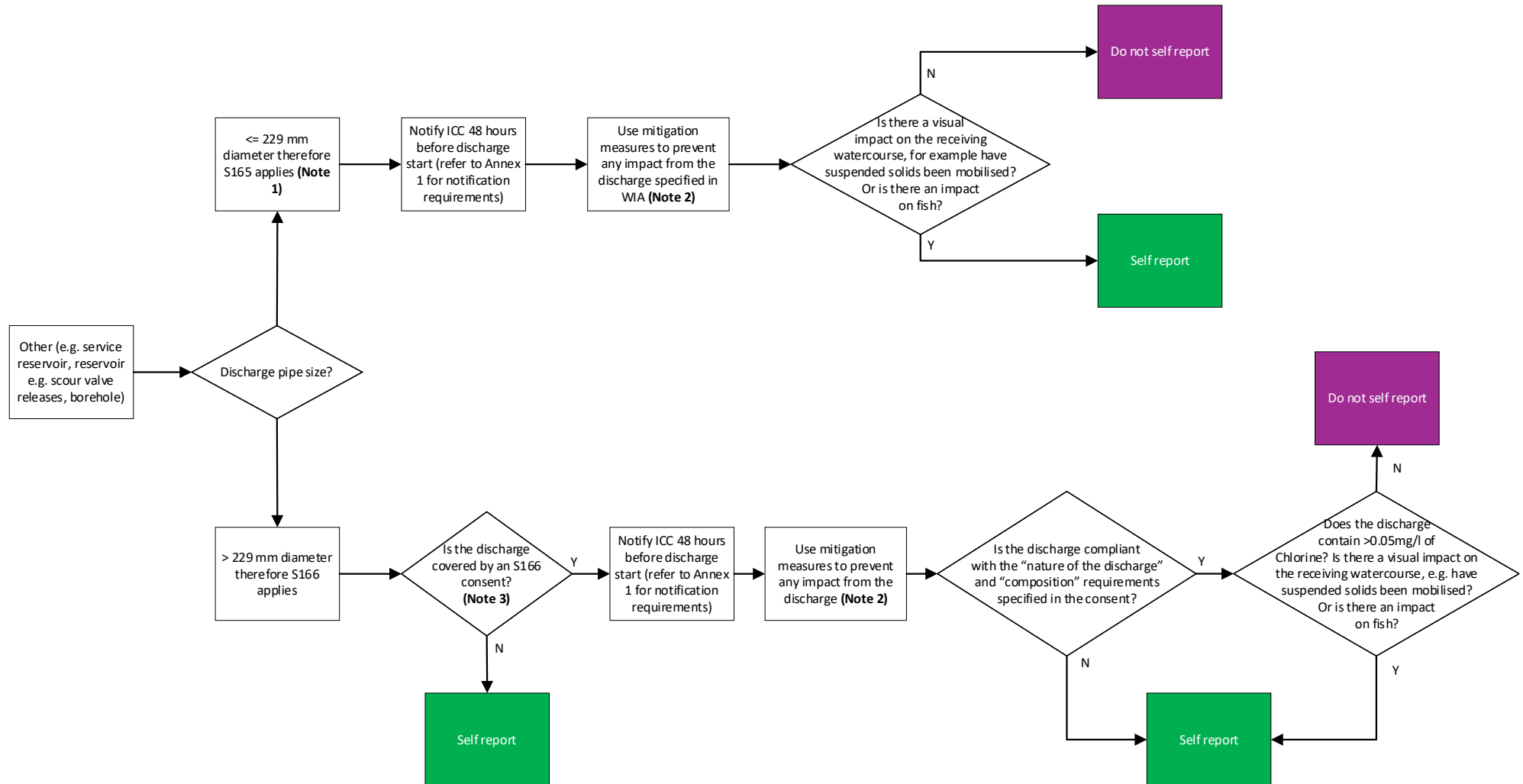
Link: <https://www.gov.uk/government/publications/groundwater-activity-exclusions-from-environmental-permits/groundwater-activity-exclusions-from-environmental-permits#de-minimis>

2.8 Discharge onto ground of public water supply auto analyser waters

You can discharge water onto ground from a public water supply auto analyser when:

- it meets UK drinking water quality standards and is suitable for public drinking water supply
- the discharge is for no more than 5m³ a day
- the location (ground), where the discharge is to occur, is free from any obvious sources of contamination
- the discharge is via a sub-surface infiltration system and not directly to groundwater
- the volume and rate of discharge will not cause pollution or any other adverse environmental impacts, including flooding, to the underlying groundwater or any adjacent surface waters (rivers, streams) or habitats

Annex 4C(3) Other (e.g. service reservoir, reservoir e.g. scour valve releases, borehole)



See notes below.

Note 1 - Section 165 discharges includes those from service reservoirs, flushing of mains, borehole testing and borehole pump renewal.

Note 2 – Mitigation measures

The WIA Act (<https://www.legislation.gov.uk/ukpga/1991/56/section/165>) requires the WCo to take all necessary steps to ensure the discharge is free as may be reasonably practicable from:

- (a) mud and silt;
- (b) solid, polluting, offensive or injurious substances; and
- (c) any substances prejudicial to fish or spawn, or to spawning beds or food of fish,

We expect mitigation measures to include the following:

- the discharge does not contain suspended solids or polluting substances as reasonably practicable
- the discharge does not scour or erode the bed or channel of the receiving watercourse
- the discharge does not flood or cause damage to railways, canals, highways or downstream stretches of watercourses
- the chlorine levels in the discharge do not exceed 0.05 mg/l
- the WCo stop the discharge if any adverse effects are observed in the receiving watercourse
- there is safe access for NRW to take samples, if required
- that discharges are made during daylight hours, unless agreed with us
- the WCo have notified stakeholders such as local angling groups, in case of sediment disturbance or a rise in water level, immediately downstream
- the WCo have notified caving groups, where applicable.

Note 3 - Section 166 discharges includes those from service reservoirs, reservoir scour valves or large raised reservoirs.