



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

**Annual Environmental
Performance Assessment 2025**
Hafren Dyfrdwy

This report can be found on our website.



Published 29 October 2026

Published by:
Natural Resources Wales
Welsh Government Offices
Cathays Park,
King Edward VII Avenue
Cardiff
CF10 3NQ

0300 065 3000 (Mon-Fri, 8am – 6pm)
enquiries@naturalresourceswales.gov.uk
www.naturalresourceswales.gov.uk

© Natural Resources Wales. All rights reserved.
This document may be reproduced with prior permission from Natural Resources Wales.

CEO's Foreword



The quality of our rivers, lakes and seas remains one of the issues people care most deeply about. Public expectations of water companies, regulators and governments continue to rise, and rightly so. People want to see cleaner waters, stronger regulation, and clear evidence that improvement is happening.

This report provides an assessment of water company environmental performance during a period of growing scrutiny, investment and change across the sector. It highlights where progress is being made and where further improvement is needed. I am pleased to see that Hafren Dyfrdwy have many areas of good performance to build upon and to share their learning with others in the water industry sector. There are several instances of year-on-year improvements that demonstrate that they are driving a performance improvement culture across the organisation. This is positive progress.

Significant investment is now being directed towards improving environmental performance, reducing pollution, and strengthening infrastructure. At the same time, Natural Resources Wales is

strengthening its own regulatory approach. Our new Water Compliance Team will increase scrutiny of water company performance and help ensure environmental obligations are met.

However, the challenges remain significant. Climate change, population pressures, and ageing infrastructure continue to affect the resilience of the water environment. Meeting these challenges will require sustained investment, innovation, and a clear focus on delivering environmental outcomes.

This report also comes at an important moment. Discussion about the future of the water sector in Wales is evolving, informed by the Independent Water Commission and the Welsh Government's Green Paper. As expectations change, so too must the way we regulate, assess, and communicate performance.

That means this report does more than look back. It provides a baseline for the next phase of regulation and improvement. We will continue to strengthen our approach, increase transparency, and focus on the outcomes that matter most: healthier rivers, lakes and seas, greater resilience and restored public confidence.

The people of Wales rightly expect high standards from all of us. Working together, we have an opportunity to deliver them.

Ceri Davies
Chief Executive of NRW

Introduction

Natural Resources Wales (NRW) is the largest Welsh Government Sponsored Body, focused on tackling the climate, nature and pollution emergencies. We work to protect and enhance Wales' resources. This means looking after Wales' land, water, air, wildlife and habitats to improve well-being and secure a better future for everyone.

As part of this, we have an important regulatory role monitoring the environmental performance of water companies. This includes investigating pollution incidents, verifying compliance with various permits, and overseeing the delivery of improvement schemes. As the environmental regulator, we are responsible for holding water companies to account to meet their legal and environmental obligations - we challenge them to take preventative action, so that pollution does not occur.

Hafren Dyfrdwy Cyfyngedig came into existence on 1 July 2018, forming a water and sewerage company that is wholly within Wales' political boundary.

All assets that were previously owned and managed by Severn Trent Water and Dee Valley Water in Wales were transferred to Hafren Dyfrdwy (HD). The only exception is Elan Valley water treatment works which, although located in Wales, will continue to be owned and managed by Severn Trent Water. We regulate this permitted discharge and provide environmental performance data to the Environment Agency, so that it can be included in Severn Trent Water reporting.

This report focuses on HD's environmental performance for 2025. We also assess Dŵr Cymru Welsh Water's performance which you can find on our [website](#).

The Environment Performance Assessment (EPA) metrics used for the ten largest water and sewerage companies in England and Wales are not directly applicable to HD due to its smaller size. However, this report considers similar environmental performance themes, including pollution incidents and compliance with environmental permits.

You can find more detailed insights on HD in our [Pollution Incident](#) and [Storm overflow spill data](#) reports.

Contents

Headline performance messages	6
Pollution incidents.....	6
Self-reporting incidents.....	7
Water discharge permit compliance	8
Discharge permit compliance	9
Flow compliance at wastewater treatment works	10
Permitted storm overflows	11
Water resources.....	13
Water resources licence compliance.....	13
Drought planning and Water Resources Management Plans.....	13
Leakage and water use	13
Wider regulatory work	13
AMP National Environment Programme delivery	13
Enforcement.....	14
Waste permit compliance	14
Sludge	14
Reservoir safety	15
Operator Monitoring Assessment (OMA)	15
Regulatory action	15
Performance expectations for 2026	19

List of Figures

Figure 1 The total number of incidents dropped to three in 2025 which is HD's best performance to date.....	7
Figure 2 Self reporting rose to 67% with only one incident not self-reported in 2025.....	8

Headline performance messages

In 2025, HD demonstrated strong performance across several key environmental indicators:

- **Serious pollution incidents:** As usual, no incidents were recorded in the serious category.
- **Compliance with numeric water discharge permit conditions:** Maintained at 100% for the third year in a row.
- **Water supply incidents:** Water supply incidents reduced from three in 2024 to one in 2025, so total incidents are the lowest they've been since 2015.

However, there are areas where performance declined and will require targeted improvement:

- **Sewerage pollution incidents:** Remained at two for 2025, the same as 2024.
- **Compliance with descriptive water discharge permit conditions:** Data submissions were sent in late resulting in non-compliances across 39 sites and a result of 35%. This is significantly lower than other years.
- **Self-reporting of incidents:** 67% - only one incident was not self-reported, a rise from 60% in 2024.

Pollution incidents

As the environmental regulator, we respond to a wide range of pollution incidents, some of which originate from water company assets and networks. We report on the number of incidents attributed to each water company to promote transparency and drive continuous improvement. Our aim is for a sustained reduction in pollution incidents, with the regulatory ambition that these are eliminated entirely. We expect water companies to prevent all serious incidents (Category 1 and 2).

We use four categories to assess the impact of pollution incidents:

- **Category 1 Major:** potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property.
- **Category 2 Significant:** potential to have a significant impact or effect on the environment, people and/or property.
- **Category 3 Minor:** potential to have a minor or minimal impact or effect on the environment, people and/or property.
- **Category 4 No impact:** non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property.

HD's pollution incident performance has improved in 2025 with a total of three Category 3 pollution incidents, which is a decrease of two. The company also maintained zero serious pollution incidents.

The graph below shows sewerage incidents remained at two in 2025. One was from a sewage treatment works, and the other from a foul sewer. Pollution incidents from water supply assets dropped to one from the water distribution system.

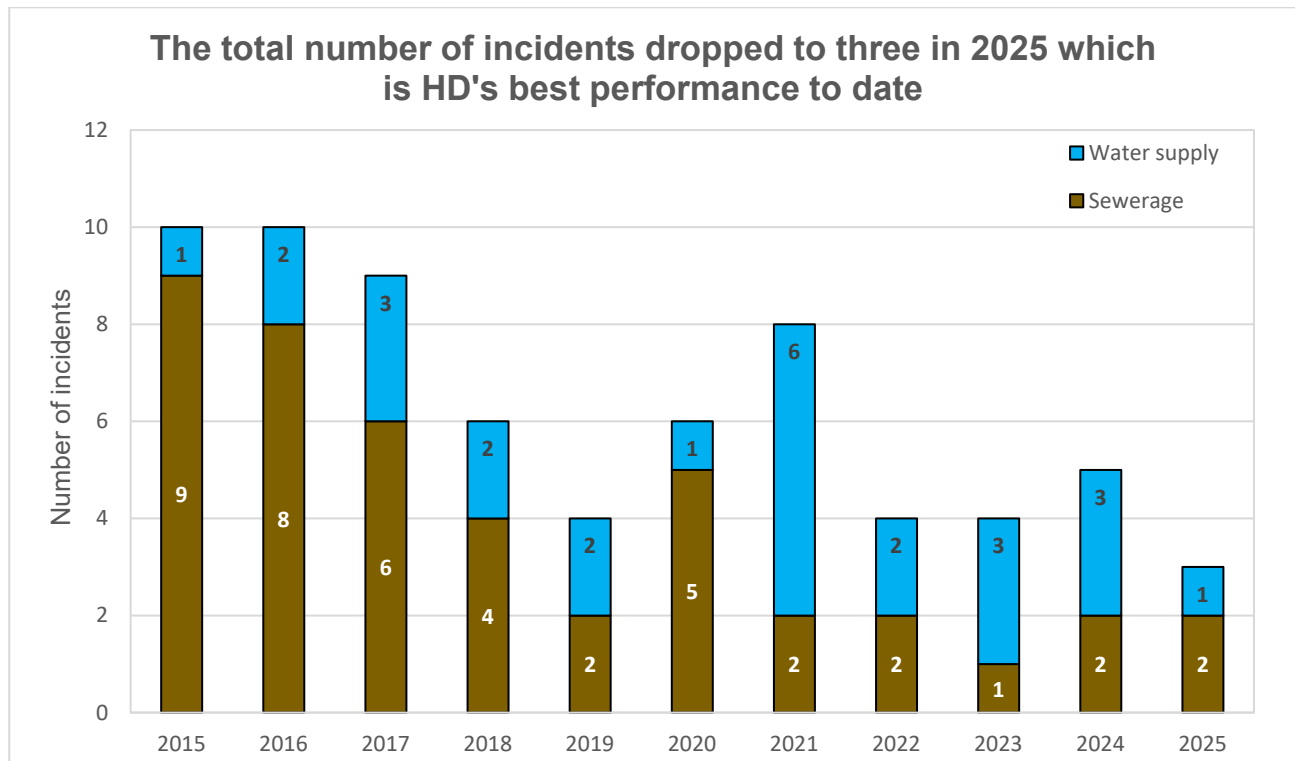


Figure 1 The total number of incidents dropped to three in 2025 which is HD's best performance to date

Self-reporting incidents

We expect water companies to self-report at least 80% of their pollution incidents to us. This means we can be more confident that the water company:

- understands their assets and networks
- continually looks for ways to improve how they predict pollution incidents, including using their own telemetry data to improve levels of self-reporting
- uses their data to identify hot spots and target high risk locations and specific asset types
- attends and reacts to incidents quickly to stop any impact as soon as possible.

HD's self-reporting performance has increased to 67% (two out of three incidents self-reported) after achieving 60% in 2024. See graph below.

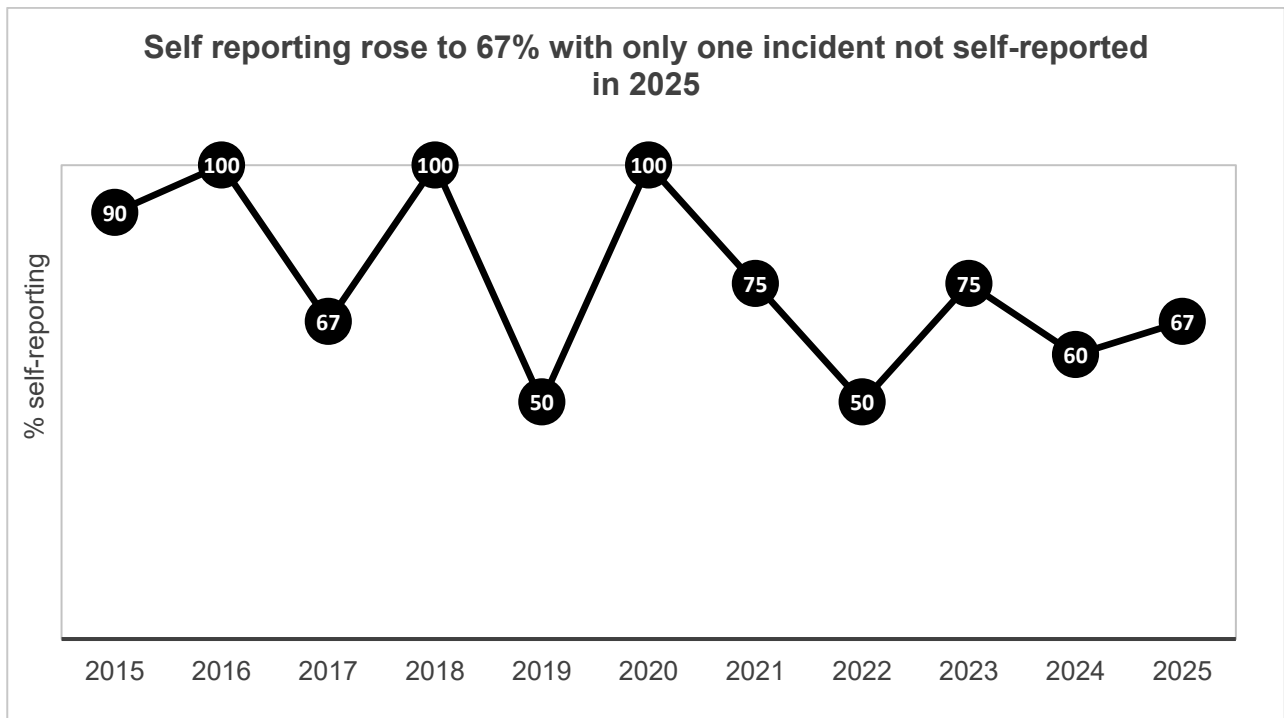


Figure 2 Self reporting rose to 67% with only one incident not self-reported in 2025

The one incident which wasn't self-reported in 2025 was from the water distribution system. A burst main caused silty water to run into a land drain in a field and enter a nearby watercourse.

Water discharge permit compliance

We issue permits for water discharges, including treated discharges from water company waste water treatment works and water treatment works. The permits require the discharge to meet specific criteria to make sure there is no deterioration to the water environment. Water companies self-monitor their discharges and provide data to us, which we assess for compliance. We have increased our compliance assessment activities, including site inspections and audits, and we expect all permit conditions to be complied with.

We use the following non-compliance Categories 1 to 4 when we assess compliance with permit conditions:

- **C1 Major:** Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
- **C2 Significant:** Potential to have a significant impact or effect on the environment, people and/or property
- **C3 Minor:** Potential to have a minor or minimal impact or effect on the environment, people and/or property
- **C4 No environmental impact:** Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

When we categorise non-compliances, we must consider the potential impact based on what is reasonably foreseeable. All non-compliances are recorded on a Compliance Assessment Report (CAR) and issued to the permit holder. Where necessary we can set actions requiring the permit holder to bring the site back into compliance with the permit and consider our enforcement options.

For their wastewater operations, HD operates a total of 50 waste water treatment works. Of these, 39 have numeric quality limits on their collective 43 discharges. The remaining 11 have descriptive permits.

For their water supply operations, HD manages six water treatment works. Five of these have numeric quality limits, and one has a descriptive permit. Three of the numeric permits are for larger sites which have a total daily flow exceeding 20 cubic metres per day.

Discharge permit compliance

Water quality numeric permit condition compliance

Using the principles of the EPA methodology, we assess the company's numeric compliance performance by looking at the percentage of discharges that failed their numeric quality limits. Therefore, we look at the 43 numeric waste water treatment works discharges and the three larger numeric water treatment works discharges.

In 2025, there were no numeric permit non-compliances for any of the 43 discharges. This is the third year running that they have achieved 100%.

	Percentage compliant	Non-compliant sites
2020	100%	0
2021	97.9%	1
2022	97.8%	1
2023	100%	0
2024	100%	0
2025	100%	0

Water quality descriptive permit condition compliance

Descriptive conditions relate to non-numeric aspects such as maintenance, management and reporting. Overall, descriptive condition compliance at waste water treatment works and water treatment works with numeric and descriptive permits in 2025 was 35.0%, far below HD's usual performance.

The low result is related to 69 individual breaches for late data submissions. Without these late data submission breaches, HD would have had only 3 non-compliances for two sites, and their compliance would have been 96.7% instead of 35.0%.

	Percentage compliant	Non-compliant sites
2020	96.7%	2
2021	91.8%	5
2022	98.2%	1
2023	95.0%	3
2024	95.0%	3
2025	35.0%	39

Flow compliance at wastewater treatment works

Dry Weather Flow (DWF) compliance

Dry Weather Flow (DWF) is the average daily volume of wastewater entering a treatment works during dry conditions, when there is no rainfall. It reflects normal flows from households and businesses. DWF is important for compliance because many discharge permits are based on this flow level. If the flow regularly exceeds the permitted DWF, it may indicate issues such as infiltration or overloading, which can affect treatment performance and lead to environmental harm.

HD provided DWF data for 2025 in accordance with their permit requirements. In 2024 no sites experienced data issues, but in 2025, five waste water treatment works were reported as exceeding their DWF permitted limits, though there were no data quality breaches. This resulted in sites discharging more treated sewage than permitted. The company is required to carry out investigations and report the cause of exceedance to us, and where appropriate complete remedial action within an agreed timescale.

Flow to Full Treatment (FFT) compliance

Flow to Full Treatment (FFT) is the maximum flow rate that a treatment works is designed to fully treat before excess flows are diverted, usually during heavy rainfall. It ensures that wastewater receives proper treatment before being discharged into the environment. Compliance with FFT is important because it helps prevent untreated or partially treated sewage from entering the water environment, protecting water quality and public health.

HD continues to proactively investigate any sites they consider to be at risk of failing their FFT permitted limits. Overflows controlling FFT at waste water treatment works are linked to annual Flow Passed Forward numeric limits in permits. There were no reported Flow Passed Forward non-compliances recorded for 2024 and 2025 data.

Monitoring certification scheme (MCERTS) compliance

MCERTS is our monitoring certification scheme. It sets standards for equipment and systems used to measure and report environmental data, such as flow rates at treatment works. Compliance with MCERTS ensures that flow monitoring is accurate, reliable, and

consistent with regulatory requirements. This helps us assess whether sites are operating within their permitted limits and protects the environment from potential harm.

All 32 of HD's sites were compliant with MCERTS re-certification requirements in 2025.

Permitted storm overflows

Permit compliance assessment

Through our incident response and permit compliance assessment work carried out in 2025, we found two non-compliances at permitted storm overflows (sewage pumping stations, combined sewer overflows and storm discharges from waste water treatment works).

One was due to a failure to meet Pass Forward Flow before discharging to storm. The other was due to the same asset operating below the required 90% operational time for Event Duration Monitoring (EDM). We expect the company to continue improving the completeness and accuracy of EDM datasets and to ensure assets consistently operate for at least 90% of the time.

Event Duration Monitoring

HD have installed event duration monitors (EDM) to monitor the number and duration of spills, on all their permitted storm overflows. This means EDM is installed on the following assets:

- storm overflows on the sewer network (combined sewer overflows);
- storm overflows from pumping stations;
- storm overflows at waste water treatment works.

In this section, we share data on permitted storm overflows only. For storm overflows currently operating without a permit, we have a programme of work underway to bring them within our regulatory framework, where appropriate. More information on storm overflows can be found on our website: [Storm overflows](#) and [Storm overflow spill data reports](#).

Unusually wet periods have the potential to result in increased spill frequency and duration, whilst dry weather has the opposite effect. We are working on a robust method to identify when spills are occurring in dry weather that will allow us to better assess storm overflow performance.

Using analysis based on long term rainfall average in Wales (1991-2020), 2025 was an Average year for rainfall, i.e. within the middle 60%. This was calculated using total rainfall across Wales from data NRW receive from the Met Office (HADUK).

Despite a dry summer, total rainfall for the year was still 97% of the long-term average (1991 to 2020). September and November were much wetter than average, recording 174% and 159% of the long-term average respectively.

Year	Wales rainfall
2021	Average year
2022	Dry year
2023	Wet year
2024	Average year
2025	Average year

EDM data reported

The data presented below uses the 2025 EDM summary data submitted by the water company in their annual regulatory return to us.

HD listed 40 permits with 50 storm overflow discharges in their 2025 return.

In 2025, only one (2%) of the water company's EDMs were in operation for less than 90% of the year. This is a good result, but we expect HD to work towards 100% of EDMs operating for at least 90% of the time. We also expect the company to continue work to improve the data completeness and accuracy for the storm overflow data sets.

Number of spills

The number of spills from storm overflows is calculated using the 12/24 block counting methodology. The Environment Agency use this same approach so there is consistency across water companies in England and Wales when counting storm overflow spills.

The spill data from HD's 50 permitted storm overflows, tells us:

- 14% (7) had 0 spills
- 20% (10) spilled between 1 and 9 times
- 46% (23) spilled between 10 and 39 times
- 20% (10) spilled between 40 and 99 times
- 0% (0) spilled between 100 and 300 times
- 0 spilled over 300 times

Duration of spills

The duration data from HD's 50 permitted storm overflows, tells us:

- 14% (7) had 0 hours of spills
- 82% (41) spilled for more than 0 but less than 50 hours
- 4% (2) spilled for at least 50 hours but less than 250 hours
- 0 spilled for at least 250 hours but less than 500 hours
- 0 spilled for at least 500 hours but less than 1,000 hours

- 0 spilled for at least 1,000 hours but less than 5,000 hours
- 0 spilled for over 5,000 hours

Water resources

Water resources licence compliance

In 2025 there were two compliance assessments of HD water resources licences, both at the same site. The second compliance visit was linked to an ongoing problem at the site. A CAR was issued with 'Enforcement Action Considered' as the enforcement response.

Drought planning and Water Resources Management Plans

Water companies have a duty to maintain water supplies in their area, without damaging the environment or affecting the needs of other water users. There is a statutory requirement for water companies to prepare, maintain and publish Water Resources Management Plans (WRMPs) and Drought Plans. The latest WRMP was published in 2024. Their Drought Plan 2025 was published in 2025. The plans are published every five years. For the latest information on HD's WRMP and Drought Plan, please see their website:

- [Water Resources Management plan 2024](#)
- [Drought Plan 2025-2030](#)

Please also have a look at our webpages for more information on these topics:

- [Water Resources Planning](#)
- [Drought](#)
- [Water company drought plan - technical guidance](#)

Leakage and water use

Water companies submit a wide variety of data to us and Ofwat, which includes leakage rates and water use. The revised leakage rates and water use information for 2025/26 should soon be available at www.discoverwater.co.uk.

Wider regulatory work

AMP National Environment Programme delivery

2025 was the first year in Asset Management Plan (AMP) 8 which runs from 1st April 2025 to 31st March 2026. During this period, HD delivered 4 monitoring schemes, to install monitoring of Flow to Full Treatment (i.e. MON4). All year 1 obligations have been met.

Enforcement

Our Enforcement and Sanctions Policy ensures that environmental offences are addressed fairly, firmly, and proportionately to prevent further harm. Enforcement actions are guided by our *Offence Response Options*, which include:

- Advice and guidance
- Formal warnings
- Civil sanctions
- Prosecution

The choice of response depends on; The severity of the offence, the offender's willingness to comply and the public interest.

Our enforcement interventions aim to:

- Cease ongoing offences
- Restore environmental harm
- Deter future breaches
- Promote sustained compliance

Minor or unintentional offences may be resolved through education or voluntary action. Prosecution is considered a last resort, pursued only when other enforcement tools have proven ineffective or where the offence is particularly serious. Please note that complex investigations may take time, and outcomes are often reported in subsequent years.

In 2025, most enforcement action taken against HD was limited to Warnings or lower, due to the nature of the offences. There were two water abstraction CARs issued with an enforcement response of 'Enforcement action considered'.

Waste permit compliance

Water companies can operate a variety of waste activities ranging from biowaste treatment, landfill, biogas combustion, sludge incineration and transfer stations.

HD do not hold any waste permits.

Sludge

HD are a producer of residual sludge from their wastewater treatment works. The total they produced for 2025 was 1,029.27 tonnes of dry solids.

However, they do not dispatch sludge as defined under the satisfactory sludge metric. This is accepted because sludge trading occurs between the water companies. HD trade their

sludge to another water company, and it is under that water company's sludge metric that the satisfactory use is reported.

Reservoir safety

HD manages 14 large raised reservoirs; 12 of which we have designated as a "high-risk reservoir". High-risk reservoirs are large raised reservoirs designated by us, where we think human life could be endangered in the event of a dam failure causing an uncontrolled release of water.

Throughout the year, we monitor quarterly compliance against key safety indicators, including:

- reservoirs without an appointed construction or supervising engineer;
- reservoirs not inspected within the required timeframe;
- reservoirs where recommended safety measures have not been completed within the timeframe recommended by the inspecting engineer.

The company's compliance is high. We recorded 100% compliance with these measures. HD has a corporate commitment to its Board to maintain this level of compliance.

HD shares its own Dams and Reservoirs Annual Review with us as a matter of transparency and diligence which we welcome.

Operator Monitoring Assessment (OMA)

We carry out these audits of operators' self-monitoring arrangements to check that WaSCs are performing the required monitoring to the monitoring standards in our permits and via our Monitoring Certification Scheme (MCERTS). The Operator Monitoring Assessment (OMA) is the systematic tool that we use to carry out these audits to highlight areas for improvement and promote best practice.

An OMA audit was conducted on 9 February 2024. This audit focused on numeric and descriptive compliance data for the 2022/2023 reporting periods. The company achieved ratings ranging from good to excellent across all assessed elements. Minor procedural adjustments were identified, and corresponding actions have been set. These will be reviewed during a future OMA audit to ensure completion and effectiveness.

There is no fixed schedule for conducting OMA audits; we undertake them based on our assessment of risk and operational priorities. While we did not carry out an OMA audit on HD in 2025, we have an OMA scheduled for late 2026.

Regulatory action

We are committed to driving improvements in water company performance through a robust and evolving regulatory framework. Our actions focus on the following key areas:

1. Pollution Incident Reduction Plans (PIRPs)

The Water Special Measures Act inserted provisions into the Water Industry Act 1991 requiring all water companies to publish Pollution Incident Reduction Plans (PIRPs) and Implementation Reports. PIRPs must clearly explain how companies will reduce pollution incidents from all their assets. Implementation Reports will be a retrospective review of how successfully the incident reduction measures were implemented. The new legislative requirements do not contain any sanctions if water companies do not manage to implement their measures.

We developed external guidance describing the content we expect PIRPs and Implementation Reports to contain. The first PIRPs had to be published by April 2026 which NRW reviewed. We sent HD a warning letter as their PIRP was not fully satisfactory. They will submit a new PIRP in 2027.

2. Drainage and Wastewater Management Plans (DWMPs)

Sewerage undertakers in England and Wales have a statutory duty to prepare, publish and maintain a Drainage and Sewerage Management Plan under section 94 of the Water Industry Act 1991. These plans are called Drainage and Wastewater Management Plans (DWMP). These non-statutory guidelines instruct sewerage undertakers as to how to prepare, publish and maintain a compliant DWMP.

We are working towards making DWMPs statutory in Wales, embedding them into long-term planning and investment strategies.

- DWMPs must be ambitious, evidence-based, and aligned with climate and environmental goals;
- They will support strategic planning over a 25-year horizon, addressing challenges such as population growth, climate change, and infrastructure resilience;
- Water companies will publish draft DWMP by November 2027, allowing for a 12-week public consultation, and a final DWMP will be released in August 2028 – DWMP29.

3. AMP8 Investment Delivery and PR24 Priorities

Water companies are required to deliver their AMP8 investment commitments (2025-2030), aligned with performance targets set through PR24, led by Ofwat.

- Regulatory priorities include reducing pollution, improving water quality, enhancing climate resilience, and delivering better services;
- We will hold companies to account for timely, transparent delivery and ensure that investments result in tangible environmental improvements.

4. Permit Compliance and Regulatory Service Plan

Our annual Regulatory Service Plan (RSP) sets out regulatory targets across regimes. Through this work, there has been an increase in regulatory oversight of water company permitted assets and associated compliance work. The aim of the RSP and associated quarterly performance reporting is to pro-actively support and develop a sustainably funded, resilient and effective regulatory service.

Strengthening permit compliance is critical to preventing pollution incidents, and we will continue to conduct more frequent and rigorous assessments to ensure companies meet permit conditions.

5. Environmental Performance Assessment (2026–2030)

The EPA methodology is reviewed every 5 years, and in 2026, we are implementing a revised EPA framework for 2026-2030.

Expectations, including many with relevance to the EPA, are set out in the [Wales Water Industry Strategic Environmental Requirements](#) (WWISER) for 2026 to 2030. This will include additional metrics to enhance scrutiny and accountability, and performance will be benchmarked to drive continuous improvement.

6. Collaborative regulation and sector improvement

We are working closely with Ofwat and other partners to drive sector-wide improvements which includes reducing pollution incidents and promoting best practice across the industry. We will continue to hold water companies accountable at all levels, from frontline operations to senior leadership.

There have been significant announcements over the past year relating to water sector regulation. The Independent Water Commission report was published in July 2025, which led to Welsh Government releasing a Green Paper in response in February 2026 - *Shaping the Future of Water Governance in Wales*. Recommendations within these documents outline a once-in-a-generation plan to transform the water system.

Additionally, the Water (Special Measures) Act introduces new enforcement powers for the water industry through Variable Monetary Penalties (VMPs) and Automatic Monetary Penalties. Please see further information below:

- Automatic Monetary Penalties will apply to specified breaches and, unlike existing enforcement options, will require NRW to issue a penalty where the legal criteria are met;
- VMPs will provide an additional civil enforcement option alongside NRW's existing enforcement tools, including criminal prosecution where appropriate;
- Financial penalties could be significant, with VMPs of up to £500,000 per breach and Automatic Monetary Penalties expected to be around £10,000 per breach;

- NRW is developing its implementation approach and supporting a forthcoming Welsh Government consultation, which is expected to run for 12 weeks from December 2026.

7. Data strategy and analytical capability

We are enhancing our data systems through our customer platform and IT strategy for 2030 by exploring tools to maximise data analysis capability, collaborating with other regulators to adopt best practices. Improved data will support more effective regulation and compliance monitoring.

In July 2025 we established a new Water Compliance Team as a national function to provide a consistent approach to water discharge compliance assessment, data management and regulatory decision-making across Wales.

During the year, the team delivered national compliance assessments across key monitoring programmes, including operator self-monitoring, flow and storm overflow data, and Urban Waste Water Treatment Regulations reporting. This has strengthened the consistency and robustness of compliance data used for regulatory reporting.

The team prioritises improving data quality and developing national processes and tools to support evidence-based compliance assessment. It has also supported the identification and resolution of complex or multi-area compliance issues, contributing to proportionate enforcement action where necessary.

Working closely with our operational teams, the Water Compliance Team provides technical advice, training and support, helping to improve consistency in compliance outcomes while supporting effective local regulatory delivery.

Performance expectations for 2026

The 2026 reporting year will mark the first year of an updated methodology for the EPA reporting cycle covering 2026 to 2030. We are also in the early stages of an Asset Management Plan period (AMP8) and of a new Price Review (PR29). Though HD are not assessed through the EPA, we use the same metrics to analyse their compliance, so changes are to be expected in 2026.

The 2026 data year represents a step change in water company reporting. In Wales, NRW published **Guidance Note 018** (Water company pollution incidents), while in England the EA published Guidance for reporting and assessing Water Industry Regulation Incidents (**WIRI**). These documents replace **LIT 11244** (Recording and categorising water industry self-reported pollution incidents, previously **Operational Instruction 16_02**), which was withdrawn on 1 January 2026. Please note that LIT is an acronym used by the EA for guidance literature. As a result of the revised guidance, we anticipate an increase in the number of pollution incidents self-reported by water companies across England and Wales.

In 2025, we expect HD to:

- Sustain strong performance on pollution incidents, maintaining zero serious pollution incidents and continuing to reduce total incidents.
- Continue to achieve 100% compliance with water discharge numeric limits
- Deliver AMP improvement schemes in line with agreed deadlines.

To further enhance environmental performance, HD should prioritise the following:

- Strive for 100% compliance with descriptive condition standards, with particular focus on achieving a minimum of 90% EDM time operational for storm overflows
- Reduce the total number of pollution incidents further
- Achieve 100% self-reporting of pollution incidents, particularly where telemetry is available (e.g. Combined Sewer Overflows)