

Compliance Assessment Report CAR_NRW0043819

Permit being assessed: LP3731SU.

For: Glascoed Munitions Factory, **held by:** BAE Systems Global Combat Systems Munitions Limited

At: Glascoed , Usk, Monmouthshire, NP15 1XL.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 21/03/2024.

Parts of permit assessed: 4.2.1 Annual Reports 2023 and EMS Targets Review 2023.

NRW Lead Officer: Rebecca Green.

Report sent to: Owain Morgan, Mechanical Services Manager, on 21/03/2024.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Information - Reporting	C4 No impact	4.2.1 Annual Reports
IR1C - Management - Energy Efficiency	Assessed (A)	
IR1D - Management - Efficient use of raw materials	Assessed (A)	
IR1E - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	
IR3A - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3E - Emissions and monitoring - Monitoring	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
1	0.1

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR4B	Ensure all reports are submitted to NRW by the due date specified in the permit.	31/01/2025

Compliance criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Forms Energy 1 2023; Water Usage 1 2023; Air - 8, Air Emissions 2023; Performance 1 2023; Waste 1 2023; Waste Q1 to Q4 2023 and the Annual Improvement Targets Summary Report 2023 were all received on 21st March 2024. All the reports are accepted.

These reports were all submitted more than a month after the due date and only prepared after BAE were reminded by Natural Resources Wales (NRW). BAE are reminded that it is their responsibility to submit all required reports by the due date specified in the permit. It is not NRW's responsibility to remind operators that reports are overdue. NRW may consider extending due dates, but only if the request is received before the due date.

BAE have been issued with a Cat4 non-compliance for the late submission of reports. In future, they should ensure that all reports are received by NRW on or before the due date.

Energy 1 2023

Total use was higher than in 2022, but about the same per tonne of steam generated (pts).

Electricity use was lower than in 2022 and decreased by 7% pts. Gas use was higher than in 2022, but about the same pts.

Oil and diesel use were less than in 2022. Oil use fell by more than 60% pts and diesel use by almost 20% pts.

Water Usage 2023

Less water was abstracted than in 2022, but more was used in the boiler house, increasing by more than 10%. However, use pts was similar to that in 2022. The proportion of abstracted water used in the boiler house almost doubled.

Air - 8, Air Emissions 2023

Emissions were measured at 90 - 100% load and all were less than the emission limit value. Boiler 3 was not in use when the monitoring was carried out.

Waste 1 2023

The total amount of waste generated was almost half that generated in 2022 and decreased by 50% pts. It was all boiler sludge generated in Q3.

Performance 1 2023

The amount of steam generated was almost 10% higher than in 2022. The other performance parameters are discussed under the relevant headings above.

Annual Improvement Targets Summary Report 2023

The target of a 2% reduction in gas consumption, vs 2023 projected values, was not achieved.

Works to install measures that are part of the Net Zero Carbon programme were delayed by other works and so the projected savings were not realised.

The target of a 2% reduction in electricity consumption, vs 2023 projected values, was not achieved, although there was a reduction in some processes.

The target of a 2% reduction in water consumption, vs 2022 actual consumption, was not met. This was due to a number of substantial water leaks which have been repaired.

BAE have set targets of a 2% reduction in gas and electricity consumption, vs 2024 projected values, and a 2% reduction, vs 2023 actual consumption, for water consumption for 2024.

The reductions in energy consumption pts and waste generation pts, and total water abstraction, are encouraging. The increase in total abstracted water used in the boiler house roughly equates to the increase in steam production in 2023.

The on-going problem of site-wide water leaks is very concerning and NRW expect BAE to make every effort to identify and repair these leaks promptly.

It is hoped that BAE will meet their annual improvement targets for 2024, as set out in this year's annual summary report.

END.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.