

Compliance Assessment Report CAR_NRW0046105

Permit being assessed: BM3965IA.

For: Broughton Aircraft Factory EPR/BM3965IA, **held by:** Airbus UK

At: CHESTER ROAD BROUGHTON , CHESTER, CHESTER, CH4 0DR.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: See Section 4 (below).

NRW Lead Officer: Victoria Griffin.

Report sent to: Head of EHS, Head of EHS, on 04/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR3H - Installations - Emissions and monitoring - Monitoring for the purposes of the Industrial Emissions Directive (includes LCP)	Assessed (A)	
IR4A - Installations - Information - Records	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

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

Wales (NRW) regulating officer to comment upon the 2023 Annual Performance Report and Annual Monitoring Returns.

Annual Performance

The Annual Performance Report was submitted via email to NRW on 30/01/25 in accordance with Condition 4.2.2.

The annual report has been reviewed and the following salient points noted:

- During 2024 manufacturing output (by mass) was increased by 6.9% compared to 2023. Airbus Broughton built 6343.38 tonnes of finished product, compared with 5945.7 tonnes in 2023.
- Total waste production increased by 14.26% (an increase of 7.09% when normalised) based on 2023 and 2024 data. The weight of waste remained below the 2030 target.
- A substantial decrease in energy consumption by 22.74%, equating to a reduction in 5,752 tonnes of carbon dioxide (CO₂), based on 2023 and 2024 data. The Operator attributes the reduction in part to reduced usage of Combined Heat and Power (CHP) and site wide LED lighting installation.
- Volatile organic compound (VOC) usage increased by 1.28% in absolute terms when compared to 2023 data.
- Water consumption decreased by 14.84% (20,332m³ reduction) in absolute terms when compared to 2023 data. The decrease is linked to several completed projects including maintenance works and a reverse osmosis.
- Total energy consumption, reported as tonnes of carbon dioxide (CO₂), and total energy consumption (MWH) was reduced by 2.54% and 5.92% respectively (in absolute terms). This equates to a 497 tonne CO₂ and a 9,294 MWH reduction. The operator reports the reductions to the implementation of energy efficiency initiatives, such as LED lighting installation and paint shop heat recovery projects.

Air Emission Monitoring

Air emission monitoring returns were submitted to NRW via email on 30/01/2025 in accordance with Condition 4.2.2.

An air emission monitoring survey for oxides of nitrogen (as NO_x), as required Condition

3.5 and Table S 3.1 of the Permit, was undertaken between 29 & 30 January and 1 & 2 February 2024.

All emission points were within the respective permitted limits.

Solvent Management Plan

A Solvent Management Plan was submitted to NRW via email on 30/01/25.

The solvent management plan summarises a number of VOC reduction initiatives introduced /continued during 2024. The 2024 Industrial Emissions Directive (IED) reduction scheme targets shows the following:

- Coating Activities VOC (gross) was 55.33 tonnes, this equates to 51.85% of the 106.71 tonne target.
- VOC waste was 0.02 tonnes.
- Coating Activities VOC (net) was 55.32 tonnes, which equates to 51.84% of the target.
- VOC emissions from coating activities, were significantly below the IED target value.

Noise Monitoring

The required 2024 noise monitoring has been delayed due to health and safety concerns associated with information provided by the contractor. The NRW regulating officer was verbally informed of the potential delay on 16 October 2024, after further consideration by the Operator this was formally confirmed to NRW by email 10 December 2024.

The Operator proposes to complete the noise survey in Q1 of 2025.

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.