OGN 200 Form 1A

Record of a Habitats Regulations Assessment

All staff using this form should be familiar with OGN200 and should have had appropriate training in HRA.

A separate version of this form is available with guidance notes on how to complete it. You should refer to those notes when using this form.

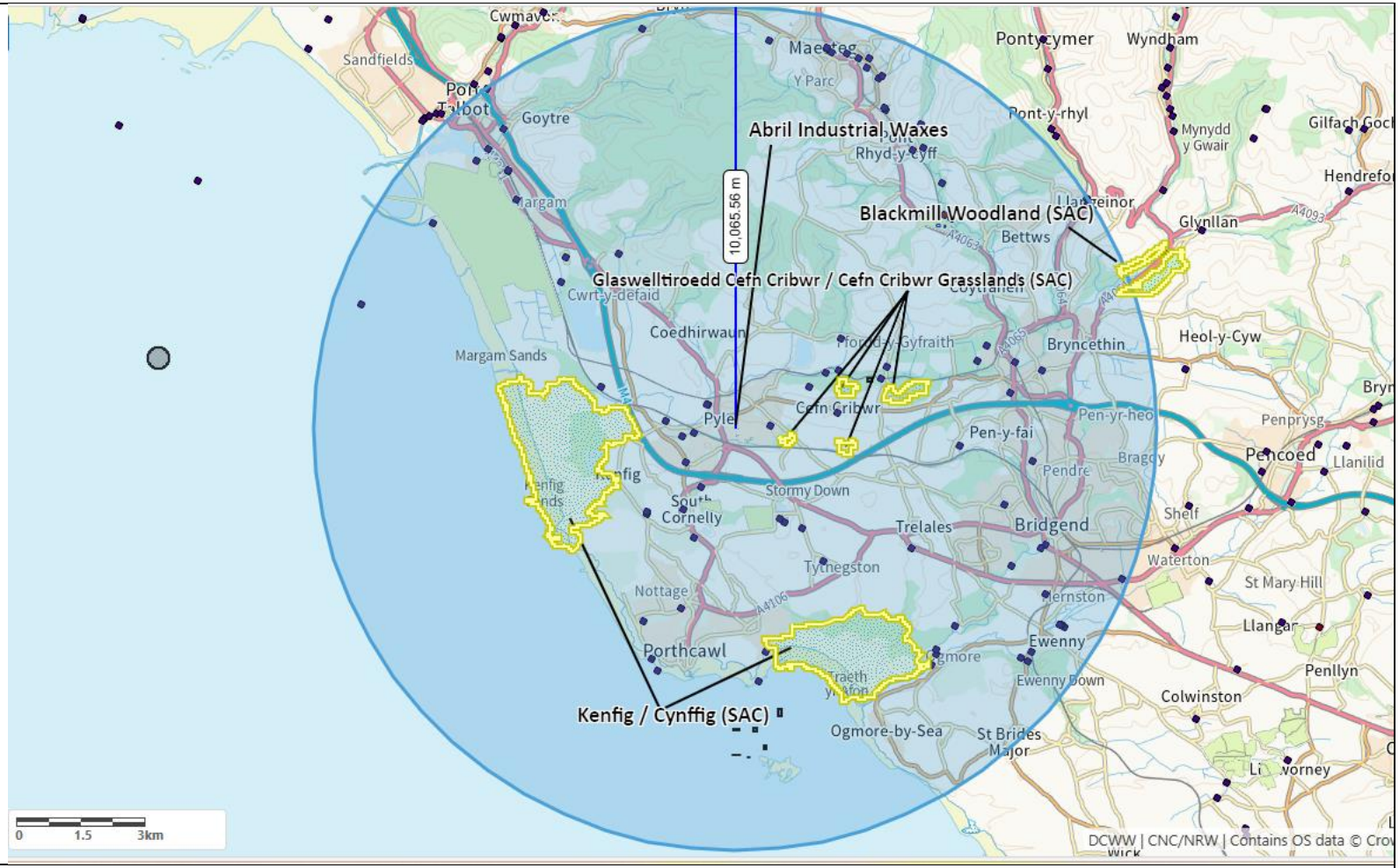
Plan or project name, brief description or application reference number	Abril Industrial Waxes Permit variation application Application: PAN-026655 Permit number: EPR/BV5858IW/V005

HRA iteration/version	**1.0**

1. Plan or Project Details

Information about the plan or project		
1	**Date application received**	Duly Made 06/05/2025
2	**Applicant details**	Abril Industrial Waxes Limited
3	**NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer**	N/A
4	**Activity proposed**	Abril Industrial Waxes limited have applied to vary their permit (EPR/BV5858IW) for their site at Pyle to add a new production line to their site. The new production line will use a new diamine (3,3'-(butane-1,4-diylbis(oxy))bispropaneamine (Baxxodur EC 280) (referred to as diamine in this document) as a raw material in the production of waxes. This production will fall under the site's the existing primary activity (reference A1). Section 4.1 Part A1 (a) does not have a threshold/limit where this applies. The variation will add the following emission points to air. • The handling system for the new diamine will have a new associated emission point to air (referred to as emission point A16) • Two emission points A14-A15 that had previously been assessed and screened out as insignificant. • Two emission points A17-A18 for pressure release from the product storage.

		All process effluent is discharged to sewer through a trade effluent consent (TEC). There are no changes to effluent volume and the TEC will remain unchanged as a result of the variation. The only discharge to surface water is uncontaminated rain water runoff. The site was previously classed as a low impact installation (LII), however as a result of the empty drums for the new diamine being classed as hazardous waste, the site can no longer achieve the below 10 tonnes per year maximum for an LII and as such the site will now be permitted as a normal bespoke installation.
5	**Relevant legislation or statutory basis**	Environmental permitting regulations 2016 Industrial Emissions Directive 2010

6	**Location**	
7	**Plan or project documents, including any application documents**	Internal on DMS here External information on the public register here: [Public register - Customer Portal]
8	**Environmental Statement**	N/A

9	**Pre-application correspondence**	N/A
10	**NRW team responsible for preparing this HRA report, and lead officer**	Installation and RSR permitting William Wallace, Senior Officer.
11	**Team or person responsible for approving the plan or project (competent authority role)**	N/A

2. Determining the need for a Habitats Regulations Assessment

2.1 Is there any possibility that the plan or project could negatively affect any European sites?	Yes- Emission to air from proposed emission point
2.2 Is the whole of the plan or project directly and only connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the European site(s) is/are designated?	No
2.3 Is there a possibility that the plan or project could affect any other feature of the European site(s) concerned, or of another European site, in a way that would undermine that feature's conservation objectives?	No

3. Considering the likelihood of a significant effect (LSE)

3.1 Renewal of a project authorisation on the same or more restrictive terms as an extant authorisation

Is this a renewal of an extant authorisation which complies with NRW approved criteria for ruling out significant effects of renewals (see Part 2 of OGN200) without conducting a project-specific LSE test?	N/A

3.2 Likelihood of significant effects (LSE) test

3.2.1 Which European sites might be affected by the plan or project?

(a)	**Based on the plan or project specification or information provided in the application, it is considered that these European sites have features which could be negatively affected by the plan or project**	• **Glaswelltiroedd Cefn Cribwr / Cefn Cribwr Grasslands SAC (UK0030113)** • **Kenfig / Cynffig SAC (UK0012566)** • **Blackmill Woodland SAC**

(b)	**The potential for the plan or project to negatively affect these European sites was also initially considered, but can be ruled out without further consideration**	N/A

3.2.2 Screening for likelihood of significant effect

TABLE 3.2.2 Screening assessment
European site name: Glaswelltiroedd Cefn Cribwr / Cefn Cribwr Grasslands SAC (UK0030113)
The main designated (SAC) feature can be found in the site's core management plan (published 2008) Microsoft Word - Cefn Cribwr Core SAC plan 290108 English.doc 1. Molinia meadows on calcareous, peaty or clayey-silt-laden soils 2. Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia (EU Species Code: 1065) The site also has 4 SSSI features which are discussed in the OGN 231 assessment for the SSSI features The only impact pathway from the proposed variation is emissions of diamine from the new emission point to air (A16-A18), although only A16 will have channelled emissions to air with A17 and A18 having negligible emissions and are present as pressure release. A14 and A15 were previously assessed and screened out as insignificant but were not integrated into the permit until the current variation. The is no direct discharge to surface water other than uncontained rain water runoff. All process effluent is discharge to sewer under a trade effluent consent.

Impact pathways
Toxic contamination – Emissions of diamine to air
The main impact pathway that could affect the designate features is through emissions of diamines

There is no ecological standard for diamines on ecological receptors, however a H1 assessment (for human health) shows that the emission rates are very low (screened out as insignificant) at point source. Therefore the diamines are unlikely to be present at any significant level to cause damage to either of the two SAC designated the features this site.

Nutrient enrichment– Screen out

The possible pathway is through deposition from emission of diamines. Given the low quantise of diamines being emitted at point source (see toxic contamination) the amount is not likely to be present at any amount that would cause any noticeable impact on the features of this site. There are no emissions of oxides of nitrogen or ammonia. As such there is no impact pathway from the proposal that would cause any damage through this impact pathway.

Acidification– Screen out

The possible pathway is through acidification from deposition from emission of diamines. Given the low quantise of diamines being emitted at point source (see toxic contamination) the amount is not likely to be present at any amount that would cause any noticeable impact on the features of this site. There are no emissions of oxides of nitrogen or ammonia. As such there is no impact pathway from the proposal that would cause any damage through this impact pathway

Habitat loss– Screen out
-No impact pathway

Physical damage– Screen out
No Impact pathway- Site located 980 meters from boundary of installation.

Smothering – Screen out
-No Impact pathway. There are no changes to emissions of particulates that would impact the designated features of the site.

European site name: Kenfig / Cynffig SAC (UK0012566)

The main designated (SAC) feature can be found in the site's core management plan (published 2013)**:** **2013 02 06 Kenfig - Cynffig SAC Management Plan Eng**
The SAC features outline in the management plan are as follows:

- Fixed dunes with herbaceous vegetation (`grey dunes`) *(highlighted as Priority Feature in the core management plan)*
- Dunes with Salix repens ssp. argentea (Salicion arenariae)
- Humid dune slacks
- Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site
- Atlantic salt meadows (Glauco-Puccinellietalia maritimae) Annex II species that are a primary reason for selection of this site
- Petalwort Petalophyllum ralfsii
- Fen orchid Liparis loesel

The only impact pathway from the proposed variation is emissions of diamine from the new emission point to air of diamines. The is no direct discharge to surface water other than uncontained rain water runoff. All process effluent is discharge to sewer under a trade effluent consent

There is also a SSSI features for the site but as the distance is beyond the risk screening distance for SSSI sites (2 km), it has not been assessed any further.

Impact pathways:
Toxic contamination – Emissions of diamine to air
The main impact pathway that could affect the designate features is through emissions of diamines

There is no ecological standard for diamines on ecological receptors, however a H1 assessment (for human health) shows that the emission rates are very low (screened out as insignificant) at point source. Therefore the diamines are unlikely to be present at any significant level to cause damage to either of the two SAC designated the features this site.

Nutrient enrichment– Screen out

The possible pathway is through deposition from emission of diamines. Given the low quantise of diamines being emitted at point source (see toxic contamination) the amount is not likely to be present at any amount that would cause any noticeable impact on

the features of this site. There are no emissions of oxides of nitrogen or ammonia. As such there is no impact pathway from the proposal that would cause any damage through this impact pathway.

Acidification– Screen out

The possible pathway is through acidification from deposition from emission of diamines. Given the low quantise of diamines being emitted at point source (see toxic contamination) the concentration of diamine being deposited is not likely to be present at any amount that would cause any noticeable impact on the features of this site. There are no emissions of oxides of nitrogen or ammonia. As such there is no impact pathway from the proposal that would cause any damage through this impact pathway.

Habitat loss– Screen out
No impact pathway

Physical damage– Screen out
No Impact pathway- Site located 980 meters from boundary of installation.

Smothering – Screen out
There are no changes to emissions of particulates that would impact the designated features of the site.

European site name: Blackmill Woodland SAC (UK0030090)

The main designated feature for the SAC aspect of the Blackmill Woodland site can be found in the site's core management plan (published 2008) Microsoft Word - Blackmill Core SAC plan Jan 08.doc.

Impact pathways:
There is one feature covered by the SAC designation

- **Old sessile oak woods with Ilex and Blechnum in the British Isles (code: 91A0)**

The main impact pathway would be through emissions to air of diamines. There no impact pathway through emissions to water.

There is also a SSSI feature as this site is beyond the risk screening distance for SSSI sites, it has not been assessed any further.

Toxic contamination – Emissions of diamine to air -Screen out
The main impact pathway that could affect the designate features is through emissions of diamines

There is no ecological standard for diamines on ecological receptors, however a H1 assessment (for human health) shows that the emission rates are very low (screened out as insignificant) at point source and as such not likely to cause any noticeable impact to the designated features of this SAC (located 9.7 km from the emission source).

Nutrient enrichment– Screen out

The possible pathway is through emissions of diamines as a source of nitrogen. However given the low quantise of diamines being emitted at point source (see toxic contamination) the amount is not likely to be present at any amount that would cause any noticeable impact on the features of this site. There are no emissions of oxides of nitrogen or ammonia. As such there is no impact pathway from the proposal that would cause any damage through this impact pathway.

Acidification– Screen out

The possible pathway is through deposition from emission of diamines. Given the low quantise of diamines being emitted at point source (see toxic contamination) the amount is not likely to be present at any amount that would cause any noticeable impact on the features of this site. There are no emissions of oxides of nitrogen or ammonia. As such there is no impact pathway from the proposal that would cause any damage through this impact pathway.

Habitat loss– Screen out
No impact pathway

Physical damage– Screen out
No Impact pathway

Smothering – Screen out
No Impact pathway. There are no changes to emissions of particulates as a result of the variation. The site is located more than 500 meters from the installation where most particulate matter would deposit.

TABLE 3.2.3 Screening decision of the plan or project 'alone'	
(a) If the screening conclusion for all features for all sites in Table 3.2.2 is 'SCREEN OUT'	**The plan or project is not likely to have a significant effect on any European site, and no further consideration under the Habitats Regulations is required in order to determine the approval/application.**
(b) If the conclusion for any features in Table 3.2.2 is 'SCREEN IN'	**The plan or project is likely to have a significant effect on one or more European sites and therefore an appropriate assessment is required.**
(c) If there are no features in Table 3.2.2 that are 'SCREEN IN' and any features that are 'IN COMB'	**The plan or project is not likely to have a significant effect on any European sites when considered alone, but the possibility of significant effects in combination with other plans and projects needs to be considered.**

6. Conclusion

HRA is not required because there is no conceivable impact on any European sites. (As documented in section 2.1)	
HRA is not required because the whole of the plan or project is directly connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, and the plan or project is not likely to have a significant effect on any other European sites. (As documented in section 2.2 and 2.3)	
This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out likely significant effects of a renewal without conducting a project-specific LSE test. Therefore, it is considered not likely to have a significant effect on any European sites, either alone or in-combination with other plans or projects. (As documented in section 3.1 of this form)	
The plan or project has been screened for likelihood of significant effects and is considered not likely to have a significant effect on any European sites. (As documented in section 3.2 of this form, and section 5 if applicable)	**X**
In light of the conclusions of an appropriate assessment it has been established that the plan or project will not adversely affect the integrity of any European sites, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans or projects. (As documented in section 4 of this form, and section 5 if applicable)	

In light of the conclusions of the appropriate assessment, it has <u>not</u> been ascertained that the plan or project will not adversely affect the integrity of any European sites, as documented in section 4 of this form, and section 5 if applicable. Approval for the plan or project <u>cannot</u> be given unless either: • **the plan or project specification, and/or the terms under which it might be approved, are modified so as to remove the risk of adverse effects, and a revised HRA is prepared, or** • **the plan or project (not being an SSSI consent*) satisfies the requirements for a derogation and a Derogation Notice is prepared and submitted for consideration by the appropriate authority, normally Welsh Ministers** **(*SSSI consents cannot be given as derogations)**	
Signed: W Wallace **Name: William Wallace** **Position: Senior Officer, Installation and RSR permitting** **Date: 07/08/2025**	
Was this HRA conclusion an escalated decision? YES or NO	

7. Consultation with the ANCB and how sections 2, 3, 4 and 5 of this HRA report (as applicable) take into account that advice.

Relevant section of the HRA report	Correspondence and/or meetings with the ANCB	Description of how the comments from the ANCB have been taken into account
2		
3		
4		
5		

8. Countersignature

I have reviewed the HRA documented in this form and confirm that I agree/do not agree with the conclusion recorded in section 6. **Additional comments (if any):** **Signed:** **Name:** **Position:** **Date:**

9. Appendix: supporting information

Application documents available on the public register: Public register - Customer Portal. Applicants main assessment on impact covered under the following documents:

1) PAN-026655 Environmental Risk Assessment Version 2 (06/05/2025)

2) PAN-026655 H1 Air Risk Assessment (14/08/2024)

3) PAN-026655 Main Variation report Version 2 (06/05/2025)