

Compliance Assessment Report CAR_NRW0049954

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: Site Inspection,

Reason: Routine.

On: 04/11/2025 between 08:30 and 11:45.

Parts of permit assessed: See below.

NRW Lead Officer: Rick Prichard.

Report sent to: Head of EHS BP (Broughton), Head of EHS BP (Broughton), on 24/11/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR1E - Installations - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3F - Installations - Emissions and monitoring - Pests	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

This was a prearranged visit of the facility by the Natural Resources Wales (NRW) Regulating Officer (RO).

The RO met with the Head of EHS BP (Broughton) and associated colleagues to discuss the current status of the facility with respect to the requirements of the permit and to discuss future plans and proposals, including the requirement for new combustion plants and the change of use for the old A380 West Factory. The salient points are summarised below:

General Management

The overall site and production lines were explained, with a significant portion of the conversation revolving around the change of use for the West Factory and the urgent need for combined heat and power (CHP) plants to help with heating and power there as well as other areas across the site. The site was made aware that a permit variation for the West Factory would need to be submitted prior to becoming operational and this was acknowledged, including NRW's current lead time for permit variation processing of approximately 12 months.

The RO agreed to look at their request for the use of emergency CHP and whether it required a permit variation or not. See below.

(Post Visit Outcomes on CHP)

After internal discussions with specialist team members and Team Leader, it was decided that as the proposed plant were mobile units and were to be used for less than 6 months, a permit variation was not required, but they were to inform NRW if any extensions on their use was required. This was conveyed to Airbus via email on 11/11/25 text below.

Email to Airbus 11/11/25

Good Morning Robert and Claire

Thankyou very much for your time during our call earlier.

Based on our conversation I am satisfied that the generators which will be used are mobile and temporary. Therefore, they will be excluded from MCP as discussed in the following document [Medium combustion plant: when you need a permit - GOV.UK](#).

Please let me know whether any extensions to their use will be required.

If you have any further question, please contact Rick or myself if Rick is unavailable.

Kind Regards

Avoidance, Recovery and Disposal of Waste

A site tour and inspection included the Effluent Treatment Plant (ETP), which was in good order although the PH levels in one area were slightly low but easily rectified. The RO was shown the end product of the swarf produced from the aluminium milling lines. Two grades of compressed aluminium 'pucks' are produced and are sold onto a 3rd party company along with swarf which is not compressed.

The site also has its own 3rd party waste disposal building where production line waste is cleaned, graded and sorted for onward disposal. This area was also in good order.

The Site

The tour/inspection of the site and production lines was done by foot and at times by vehicle due to the distances involved between relevant areas. The site was clean and well managed.

Pests

We discussed the issue of pests on site, mostly of the bird variety as the site is also a functioning airport. Plans to develop/improve unused land for nature and the environment are ongoing, but must account for the a potential increase of problem species that might inhabit the areas if smaller prey species move in the take advantage of a new environment. Rodent boxes were also placed around the site which are checked regularly by a 3rd party company.

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.