Compliance Assessment Report CAR_NRW0052859

Permit being assessed: JP3536LS.

For: St Asaph Lens Coating EPR/JP3536LS, **held by:** Qioptiq Ltd

At: Glascoed Road , ST. ASAPH, Denbighshire, LL17 0LL.

Type of assessment: Site Inspection,

Reason: Routine.

On: 20/08/2026 between 13:42 and 16:42.

Parts of permit assessed: See below.

NRW Lead Officer: Ricky Hartleb, accompanied by Hannah Ibbotson.

Report sent to: EHS Manager, EHS Manager, on 10/09/2026.

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)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Action only (X)	
IR4A - Installations - Information - Records	Action only (X)	

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?

Criteria	Action needed	Complete by
IR2B	See action 1	30/11/2026
IR4A	See action 2	30/11/2026

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

Natural Resources Wales Senior Industry Regulation Officers Ricky Hartleb and Hannah Ibbotson visited St Asaph Lens Coating, operated by Qioptiq Limited of Glascoed Road, St Asaph, Denbighshire, LL17 0SS at 13:42 on Thursday, 20th August 2026, as part of an arranged site familiarisation / compliance visit.

Officers were accompanied by the EHS Manager, EHS Lead and the EHS Deputy.

At the time of the visit, the permitted installation was operational. Based on the areas inspected and information provided during the visit, the activities observed appeared consistent with the activities authorised by permit JP3536LS.

IR1A General Management

A briefing was provided outlining the site's operations and management arrangements.

The site is divided into several zones where different production processes are undertaken. There was clear separation between activities, with established processes in place for managing each area.

The site's management systems were reviewed and provided a good overall view of the arrangements in place for risk management, maintenance, staff training and auditing. Officers were advised that all staff receive overview training on the requirements of the site's environmental permit.

The management demonstrated good operational knowledge and awareness of their regulatory obligations.

No permit non-compliance was identified.

IR2A Permitted Activities

The site was operational and appeared to be operating within its permitted activities at the time of the visit.

The main environmental risks associated with the permitted installation include the storage and use of hazardous process gases, emissions, operation of gas abatement systems,

fugitive emissions and the storage and transfer of wastes arising from permitted activities. Officers were also advised of other materials and activities present across the wider site, some of which may be subject to separate regulatory controls.

A designated waste storage area was inspected. The area was tidy, with different waste types appropriately segregated and stored within their own containers prior to collection and disposal.

No permit non-compliance was identified.

IR2B The site

Several containers without contents labels were observed within one of the site buildings. Site representatives could not immediately identify the contents but subsequently confirmed that the containers held germanium. The containers appeared intact, and no evidence of leakage, spillage or pollution was observed. It was not established during the visit that the material was waste or that it formed part of the permitted activity.

Action 1: Review the arrangements for identifying stored materials and wastes and ensure that containers are clearly labelled with their contents and, where relevant, their hazards and waste status. Please provide confirmation of improvements made to NRW by 30 November 2026

This action is provided as management-system advice. No evidence of pollution or breach of a specific permit condition was identified, and no CCS score has been applied.

IR4A Records

Officers reviewed a sample of records during the visit and the site's Fire Prevention and Mitigation Plan was also discussed.

A document was shown to officers which appeared to contain the information expected within an FPMP. This included an overview of the site and QR codes for individual operational areas. When scanned, the QR codes provided details of the chemicals stored within those areas, together with the relevant COSHH documentation required in the event of an emergency.

Action 2: Provide Natural Resources Wales with a copy of the site's current accident management plan / Fire Prevention and Mitigation Plan.

No permit non-compliance was identified.

Summary

No permit non-compliances were identified in relation to the matters considered during this

familiarisation visit. Based on the areas inspected, records sampled and information provided, the permitted activities observed appeared to be operated in accordance with the relevant permit requirements. This visit did not constitute a comprehensive assessment of every condition of permit JP3536LS.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form
If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales

Concerns Not Related to the Content of this Compliance Assessment Report Form
If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone**: 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email**: enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone**: 0300 790 0203
- **Email**: 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.