# Compliance Assessment Report CAR_NRW0052200

**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:** Other,

**Reason:** Other.

**On:** 26/06/2026 - 29/09/2026.

**Parts of permit assessed:** See below..

**NRW Lead Officer:** Rick Prichard.

**Report sent to**: Head of EHS, Head of EHS, on 29/09/2026.

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

| Part of permitted activity assessed (compliance criteria) | Assessment result | Permit condition |
|---|---|---|
| IR2A - Installations - Operations - Permitted activities | 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 Compliance Assessment Report (CAR) has been generated by the Natural Resources Wales (NRW) Regulating Officer (RO) in response to the operator's request on 29/04/2026, to change out two old burners from their existing hot water boilers that are permitted at 1.758MWth **Net Rated Thermal Input** each, and which discharge through a single stack (A10). The replacement burners have a range of 0.85 and 4.25MWth, and so would be above their permitted limit without restrictions being made. The operator stated that they wished to swap these burners out over the summer shutdown period.

Several NRW internal discussions were convened, including with the Industry and Waste Regulations Approaches Team to understand what effect these proposed changes might have on the environment and whether a permit variation would be required. To that end, the operator was requested on 07/05 and again on 03/06, to provide further information on the following:

1. **Evidence that the proposed new burners will have a positive effect on emissions through Stack A10.**
2. **Provide more information on how engineers would cap any new burners at 1.758MWth to prevent exceedance of current permitted levels, and how this could be checked/audited.**

The operator responded on 15/06/26 and 11/09/26 with the following answers:

- The two current hot water boilers feed into stack A10: HWB12 and HWB13. They were last monitored in 2023 for Oxides of Nitrogen (as NOx) mg/m3. HWB12 had a result of 156.63mg/m3 and HWB13 133.1mg/m3. After the burners are replaced the boilers will be subjected to the same monitoring methodology and are expected to achieve a lower result. The expected maximum value is 125mg/m3.

- Both burners will be capped at 1.758 MWth via password-protected software controls, with manual overrides strictly disabled. Removing this cap requires a certified Nuway boiler engineer operating under a formal Permit to Work (PTW). Detailed process requirements and competency criteria are outlined in UKCPR4079 (Appendix 6).
  The PTW process requires the scope of work to be formally specified, approved, and continuously monitored. Upon completion, a formal handover and close-out must take place prior to resuming normal operations, ensuring all modifications are recorded and Airbus maintains complete visibility of system changes. Permits to work for these activities are issued exclusively by the internal Airbus Industrial Maintenance team.
  Additionally, any activity involving burner modification must be documented, reviewed, and signed off via the internal Airbus Management of Change (MOC) process (see Appendix 3). This requires formal authorisation from either the Maintenance Engineering Manager or
  Maintenance Manager, following consultation with site Environmental Health and Safety (EHS).
  Verification of the boiler locks and maintenance of the 1.758MWth cap will be integrated into the equipment’s Planned Preventive Maintenance (PPM) schedule.

This will be conducted quarterly by a certified boiler engineer, aligning with the existing PPM cycle.
Engineer updates will be logged in SAP(Airbus asset management system) and reviewed during the subsequent monthly PPM Review. Additionally, a monthly EHS Review is conducted within the business area, where the EHS Controller and the responsible Contract Manager verify that all PPMs have been completed. This includes supplying data to confirm that the boiler has undergone a PPM review within the last three months and remains capped at 1.758MWth. All compliance data is documented and tracked within the Airbus SAP PPM module.

After due consideration, NRW is satisfied that the change to the new burners should result in positive environmental outcomes/decreased impacts and a permit variation is not needed at this time. However, the changes to the hot water boilers concerned will need to be added onto the operators permit with the next permit variation.

In addition, once the equipment has been commissioned the operator will arrange for stack A10 to be monitored and share this data with NRW. Should the new emissions exceed permitted levels, we will re-visit the issue and work with the operator to seek a solution. Once the commissioning has taken place and the systems are working, the NRW Regulating Officer will arrange a site visit to confirm the new equipment is operating within permitted levels.

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.