Compliance Assessment Report CAR_NRW0039367

Permit number	DP3832EF	**Operator name**	Biotage GB Limited

Site name	Biotage GB Limited
Site address	Unit C IST House, Distribution Way, Dyffryn Business Park, Ystrad Mynach, Hengoed, CF82 7TS
Assessment type	Report/Data Review

Date of assessment	15 February 2022	**Time in**	N/A	**Time out**	N/A

Parts of permit assessed	Monitoring and reporting requirements

NRW Lead officer	Guy Baskerville	**Accompanied by**	N/A
Report sent to – Name and position	Robert Xerri Senior Chemistry Production Manager	**Date**	15 February 2022

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales	C4 No environmental impact	4.2.3
G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales	C4 No environmental impact	4.2.2

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

Total number of non-compliances recorded	Total non-compliance score
2	0.2

2. What action is required?

Criteria	Action needed	Complete by
G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales	Submit monitoring reports inside reporting window	N/A
G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales	Submit performance reports inside reporting window	N/A

Action 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 prosecutions and/or suspension or revocation of your permit.

4. Details of our assessment

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter *NRW*) assessment against Biotage GB Limited's (hereafter '*Biotage'*) **annual** [2021] monitoring and reporting requirements. NRW's assessment of Biotage's monitoring returns data is outside the scope of this CAR and any non-compliance arising from an exceedance of a permitted emission limit will be recorded in a separate CAR.

Condition 4.2.3 of the environmental permit states:

Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

(a) in respect of the parameters and emission points specified in schedule 4 table S4.1;

(b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and

(c) giving the information from such results and assessments as may be required by the forms specified in those tables.

Table S4.1 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.1 Reporting of monitoring data			
Parameter	**Emission or monitoring point/reference**	**Reporting period**	**Period begins**
Emissions to air Parameters as required by condition 3.3.1	A1, A2, A3 & A4	Every 12 Months	1 January

Table S4.4 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.4 Reporting forms		
Media/parameter	**Reporting format**	**Date of form**
Air	Form air 1 or other form as agreed in writing by Natural Resources Wales	08/05/2014

Monitoring report(s) for emissions to air had not been submitted at the time of assessment.

The monitoring report(s) submission was not made inside the reporting window which represents non-compliance with the environmental permit.

As a result of this non-compliance a CCS Score [C4] has been recorded against compliance sub-criteria G4: Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales.

Condition 4.2.2 of the environmental permit states:

> *A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum:*
>
> *(a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;*
>
> *(b) the annual production/treatment data set out in schedule 4 table S4.2; and*
>
> *(c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.*

Table S4.2 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.2 Annual production/treatment	
Parameter	**Units**
Total amount of product produced for each listed activity (A1-A4)	Tonnes
Total amount of Hazardous waste produced	Tonnes
Total amount of Non-Hazardous waste produced	Tonnes

Table S4.3 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.3 Performance parameters		
Parameter	**Frequency of Assessment**	**Units**
Potable water usage	Annually	Tonnes
Energy usage - Electricity	Annually	MW/h
Energy usage – Natural Gas	Annually	MW/h
Total of each raw material used for each activity	Annually	Tonnes

Table S4.4 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.4 Reporting forms		
Media/parameter	**Reporting format**	**Date of form**
Water	Form water 1 or other form as agreed in writing by Natural Resources Wales	11/08/2016
Energy	Form energy 1 or other form as agreed in writing by Natural Resources Wales	11/08/2016
Other performance indicators	Form performance 1 or other form as agreed in writing by Natural Resources Wales	08/05/2014

Performance report(s) had not been submitted at the time of assessment.

The performance report(s) submission was not made inside the reporting window which represents non-compliance with the environmental permit.

As a result of this non-compliance a CCS Score [C4] has been recorded against compliance sub-criteria G4: Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales.

[END]

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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 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 – 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.