

From: [REDACTED]
To: [REDACTED] [@cia.org.uk](mailto:[REDACTED]@cia.org.uk)
Cc: [REDACTED]
Subject: NRW update notes for your South Wales responsible care cell meeting in Newport
Date: 29 March 2023 10:27:00

Good morning [REDACTED],

Here are some notes about my NRW slot in your South Wales responsible care cell meeting in Newport last week. I have also included some changes to those notes due to recent developments since last week's meeting.

Surveys

Thank you for those that completed

- the MCP survey – it has helped us plan for their review and revision and
- the fluorinated firefighting foam – although C8 fluorinated firefighting foam has restrictions placed on it, it looks likely that its C6 alternative may go down a similar route of restrictions in the future. Fluorine free firefighting foams are now commercially available and it may be worth looking at these alternatives if/when the use of the C6 alternatives become restricted.

NRW will look at carrying out a survey on implementing climate change work, probably in May. Initially it will be sent to COMAH sites in Wales asking about climate change adaption asking about its implementation and progress. It is likely to include asking about standards and guidance used, self-assessed progress on implementation, assessing the risk posed by a changing climate and about prioritising those risks. NRW will look at using the results of this type of survey to plan its COMAH interventions in 24/25.

Assessment of Safety report revisions

The assessment of revised safety reports was discussed in a COMAH strategic forum (CSF) call. During that call, the regulators were asked about any planned changes to the assessment of revised safety reports. NRW is looking to change some aspects of how some safety report revisions are assessed. Where a safety report has been rewritten, NRW, along with HSE, there should be no changes to the assessment process and will continue to use the safety report assessment manual (SRAM) for the assessment of rewritten safety reports.

For those reports that are not rewritten, NRW has altered its approach –

- our NRW assessors will continue to only assess any changed content, take a proportional approach to assessment and they will continue to use the SRAM section 13 guidance and documentation for assessing and recording their assessments.
- There should be less formal information requests and 5 year revision items coming from these assessments and
- These formal information requests and revision items may be replaced by face to face resolution on any issues found during these assessments.

Strategic review of (NRW) charges.

At the meeting, I said that a new charging approach was due to be launched in early April – however it looks like that launch has been delayed – sadly I do not have a time scale for any revised launch of this replacement scheme.

NRW subsistence charges will continue as planned using the EP OPRA approach and this old spreadsheet that contained macros, which are a cybersecurity threat, is now available in a version in excel without any macros. If your members need a copy of this alternative EP OPRA spreadsheet please contact their site officer who should be able to send you a copy.

It is likely that NRW charges will raise by around 6% across the board.

Hydrogenated vegetable oil (HVO)

NRW is looking at how its deals with requests to replace gas oil with HVO in combustion plant. HVO can replace gas oil without changes to the EPR permit but the HVO must meet certain EN standards however if the combustion plant is in the UK ETS scheme, then the ETS permit must be changed to allow the use of HVO before the HVO is used in the combustion plant. If your members have any questions about the use of HVO as a drop in replacement for gas oil, please contact their site officer.

Finally, but not in the NRW slot [REDACTED] alluded to some potential changes to some generic UK BAT conclusions. It now looks like the UK Standards Council has withdrawn three generic BAT conclusions covering Circular Economy, Climate Change Adaptation and Climate Change Mitigation from the draft BAT conclusions for some Tranche 1 sectors.

Thank you for the invite to this meeting which I found very interesting and useful.

Regards

[REDACTED]

[REDACTED]

Uwch Ymgynghorydd / Senior Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales

Ffôn/ Phone:

Symudol / Mobile:

Plas Gwendraeth, Heol Parc Mawr, Cross Hands, Sir Gaerfyrddin SA14 6RE /
Plas Gwendraeth, Heol Parc Mawr, Cross Hands, Carmarthenshire, SA14 6RE

E-Bost/E-mail: [REDACTED]@cyfoethnaturiolcymru.gov.uk
[REDACTED]@naturalresourceswales.gov.uk

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy.

Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

cyfoethnaturiol.cymru / naturalresources.wales

[Twitter](#) | [Facebook](#) | [LinkedIn](#) | [Instagram](#)

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.