



UK Health  
Security  
Agency

Environmental Hazards and Emergencies Department  
Seaton House, City Link  
London Road  
Nottingham, NG2 4LA

[nsipconsultations@phe.gov.uk](mailto:nsipconsultations@phe.gov.uk)  
[www.gov.uk/ukhsa](http://www.gov.uk/ukhsa)

Your Ref: EN010120  
Our Ref: 62964

Ms Caroline Jones  
Lead Member of the Examining Authority  
The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol BS1 6PN

22<sup>nd</sup> February 2023

Dear Ms Jones

**Nationally Significant Infrastructure Project  
Drax Power Limited: Drax Bioenergy with Carbon Capture and Storage (EN010120)  
Written Questions**

Thank you for the written questions directed to UK Health Security Agency (UKHSA) on 24<sup>th</sup> January 2023. The response is impartial and independent.

Having considered the submitted materials throughout this process, we wish to make the following specific comments and recommendations in response to your questions.

***Question AQ.1.11: Several Relevant Representations raise concerns regarding potential carcinogenic effects of compounds that form from the emissions to air of amines. The applicant provided its response in point 16.1 of the Applicants Response to Relevant Representations and Additional Submissions [AS-038]. The EA and UKHSA are each asked to provide comment on whether further assessments of the impacts to human health is required.***

UKHSA is satisfied that the applicant's risk assessment for amine emissions from the proposed post-combustion carbon capture plant is appropriately conservative and in-line with the current knowledge base relating to nitrosamines and nitramines. The Proposed Development will be subject to a variation to the existing Environmental Permit, EPR/VP3530LS for Drax Power Station. Therefore, the applicant's identification,

assessment and amine emission control will also be assessed during the environmental permit variation application. UKHSA is consulted by the Environment Agency on potential health risks of activities regulated by the Environmental Permitting Regulations (2018), with emissions to air forming part of this assessment.

***Question MAD.1.1: Can the UKHSA comment on the applicant's approach to assessment of major accidents as set out in the ES Chapter 17 [APP-053] in the context of the Proposed Development, including elements of novel technology. Does the UKHSA consider that the applicant has sufficiently identified and assessed the potential risks associated with the CCS component?***

The applicant has included and considered appropriate accident and hazard scenarios and demonstrated mitigation measures to ensure risk is 'as low as reasonably practicable' (ALARP). It appears that the applicant has considered appropriate guidance and best practice information to determine the assessment methodology and that a conservative approach was used in the analysis. Furthermore, the Proposed Development will require appropriate permissions to be in place for its operation including COMAH Licence and environmental permit, and these regulatory controls will stipulate several requirements that must be demonstrated to prevent or minimise the effects of major accidents.

The Health and Safety Executive (HSE) have dedicated guidance on carbon, capture and storage (HSE, 2021) and as the competent authority for COMAH sites, may be able to further advise on the appropriateness of the applicant's assessment of major accidents in the context of the Proposed Development comprising elements of novel technology.

Yours sincerely

On behalf of UK Health Security Agency  
[nsipconsultations@ukhsa.gov.uk](mailto:nsipconsultations@ukhsa.gov.uk)

*Please mark any correspondence for the attention of National Infrastructure Planning Administration*