

**Editor's Note:** This is the second in a series of articles summarizing various country's government and SH&E legislative processes. The initial profile was of Japan. It is intended to serve as a useful planning tool for companies and SH&E professionals preparing to conduct business in profiled country. The material contained has been provided courtesy of ENSR International. Requests for additional country information should be direct to Hally Moriyama @ensr.com or Jack Fearing at [jack\\_fearing@ars.aon.com](mailto:jack_fearing@ars.aon.com) / +1-973-463-6240.

## Country Profile – The United Kingdom



### Government

#### Overview

The United Kingdom is a limited monarchy with an unwritten constitution that is based upon statutes, historic documents (Magna Carta, the Petition of Right and Bill of Rights), common law and custom. The "constitution" is flexible and can be changed by an act of Parliament. The British monarch is the head of state.

The executive authority is vested in a Prime Minister, who is head of Government, and a committee of ministers who form a cabinet. The Prime Minister is usually the leader of the political party having a majority in the House of Commons, which is part of the bicameral Parliament. Cabinet members are selected by the Prime Minister from members of both houses of Parliament, though most are from the House of Commons. These ministers head the various governmental departments. In addition, the individual secretaries of state for England, Scotland, and Wales (and Northern Ireland) also serve in the cabinet. These secretaries serve as administrative heads of each of these geographical divisions. Following referendums that were held during the course of 1997, both Wales and Scotland now have their own regional assemblies, which will have a degree of legislative autonomy in relation to devolved matters.

The legislative branch consists of two houses, the House of Commons and the House of Lords, which together form the Houses of Parliament. The House of Commons consists of members of parliament (MPs) who are popularly elected from each of 659 geographical constituencies, with each constituency being represented by its own MP. The House of Lords was reformed in 1999 following an expressed desire on the part of the current Government to eliminate the role of hereditary peers. A compromise was reached and there are now 92 hereditary peers (whose titles can be inherited), 531 life peers (whose titles cannot be inherited), 27 current or retired Law Lords, and 26 minor members of the church. The members of the House of Lords are not elected. Life peers typically are

distinguished judges or those who have been recognized for their service to the Government.

The highest court in the country is the House of Lords. In England and Wales, the House of Lords hears appeals from the Court of Appeal, which is divided into two divisions, civil and criminal. Below the Court of Appeal is the High Court, which deals with most of the civil cases not dealt with in County Courts (generally the most complicated and difficult cases). The High Court is divided into three divisions, the Chancery Division, the Queen's Bench Division, and the Family Division. Environmental disputes are often heard in the Queen's Bench Division, which handles civil disputes in tort and contract. A number of specialised courts form part of the Queen's Bench Division, including the Commercial Court. Minor civil actions are typically handled by County Courts. There has been considerable discussion in the UK as to the need for and merits of a specific "Environmental Court," but there are no proposals for such a Court being considered seriously by the Government.

Breach of most EH&S legislation is a criminal offence. The Crown Court and the Magistrates' Court both hear criminal cases, with the former handling the more serious cases. Criminal appeals from the Crown Court can be referred either to the Queen's Bench Division or to the Court of Appeal, depending on the circumstances of the appeal.

There is a separate court system in Scotland, though there is some convergence at the highest level (House of Lords). The Scottish system is different because of that jurisdiction's distinct legal system, which is based on Roman law principles rather than the common law. In contrast to England and Wales, prosecutions for breaches of legislation cannot be instituted directly by the Scottish Environmental Protection Agency ("SEPA") or the health and safety enforcing authority, but are instituted by the Procurator Fiscal. The Procurator Fiscal needs to be satisfied that there is sufficient evidence and that the prosecution is in the public interest. The views of the enforcing authority are, however, taken into account.

### **Legislative Process**

A cabinet minister initiates most legislation, though in theory any member of Parliament may propose a bill. Local authorities, statutory local service providers and private companies usually promote Private Members' bills. The organization sponsoring the bill must begin the legislative process by submitting a petition. All proposed laws (statutes) require approval by the House of Commons and the House of Lords, though the latter body cannot stop a bill from becoming law if approved by the House of Commons. Acts or laws require Royal Assent. In order to become effective, most environmental statutes require a further step, usually involving a "Commencement Order." There can often be a significant time lag between the Royal Assent and the issuance of the Commencement Order. For example, the contaminated land provisions contained in the

*Environment Act 1995* did not come into effect until 2000. Regulations issued by governmental ministries pursuant to legislation, on the other hand, do not require either Royal Assent or, in most cases, the specific approval of Parliament although they are “laid before Parliament” usually for a minimum of three weeks before taking effect.

Parliamentary acts generally contain a broad framework concerning the issue or issues being addressed. The act itself is referred to as the primary legislation and can only be changed by Parliament. The regulations or orders providing the detailed requirements are referred to as secondary legislation or statutory instruments.

Government circulars or statements often deal with environmental matters and are issued by the Department responsible for environmental or planning matters and provide central policy guidance regarding the Secretary of State's current thinking on a particular issue.

Codes of practice and guidance notes generally consist of more technical instructions on a particular issue. Some health and safety Codes of Practice carry a higher status, namely Approved Codes of Practice or ACOPs. In a prosecution for breach of health and safety law where it can be shown that the defendant did not follow the ACOP then a court is entitled to find the defendant guilty unless the defendant can show compliance in some other way. The interpretation of EH&S legislation lies ultimately with the courts.

In recent years, a great deal of environment and health and safety legislation has been introduced in Great Britain (and other European Union countries) to implement European legislation and this will continue in the coming years.

### **Health and Safety Authorities**

Primary responsibility for the development of health and safety legislation and for the enforcement of health and safety regulations lies with two authorities, the Health and Safety Commission (HSC) and the Health and Safety Executive (HSE). The HSC, which reports to the Secretary of State, is responsible for developing policy and approved Codes of Practice whereas the HSE, who operate under the authority of the Commission, are responsible for the enforcement of health and safety laws. The functions of the HSC and HSE are performed on behalf of the crown; their staff are civil servants. The HSE operates through local authorities (environmental health officers) to execute some of its duties in relation to commercial premises, mainly involving the distribution, retail, office, leisure and catering sectors.

### **History of Safety & Health Legislation**

## **Occupational Health and Worker Safety**

Health and safety has been an important area of regulation in Great Britain for over a century, with most of the earlier legislation having grown out of health concerns over water supplies and working conditions within factories. Much of this earlier legislation was consolidated in 1974 under the *Health and Safety at Work etc. Act 1974* (HSWA), which now provides the framework for health and safety law in Great Britain.

The HSWA operates by imposing certain over-riding general duties on employers. To the extent that it is "reasonably practicable to do so;" these duties include (i) ensuring the health, safety and welfare of their employees; (ii) conducting their undertakings in such a way as to ensure that persons not in their employment (such as independent contractors or the public) are not exposed to risks to their health and safety; and (iii) ensuring that the plant, premises, or substances in the premises are safe and not imposing risks to health.

The critical term, "so far as is reasonably practicable," is not defined in the legislation, but there is case law on its meaning. Reasonably practicable considers both the risk involved and the effort that may be involved to avert the risk. "The Health and Safety System in Great Britain," published by the HSC (2002 edition), describes what is meant by reasonably practicable as follows: To do something "so far as is reasonably practicable," for example, means to ascertain and apply up-to-date good practice wherever it is established, since clearly it is always practicable to do that. Where good practice is not specified or obvious, it is reasonable to weigh the seriousness of the risk against the difficulty and cost of reducing or removing it. In such cases, risk-reducing measures must legally be pursued up to the point where the taking of any further steps would be grossly disproportionate to any residual risk. These rules are regardless of company size or economic circumstances." Reasonable practicability operates as a defense. The burden of establishing the defense is on the defendant (ie, the prosecution only need prove that the plant or system of work was unsafe to make a prima facie case).

Relative to ensuring the health, safety and welfare of workers, employers are obligated to (i) provide and maintain plant and systems of work that are safe and without risk to health; (ii) ensure safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances; (iii) provide information, training and supervision as necessary to ensure the health and safety at work of employees; and (iv) provide and maintain a working environment for employees that is safe and without risks to health.

Great Britain has also implemented a comprehensive set of more specific occupational health and workplace safety regulations and supplementary Approved Codes of Practice covering a wide range of topics and issues, including:

- the control of substances hazardous to health (“COSHH”);
- the prevention and control of major industrial accident hazards (“COMAH”);
- the removal of asbestos (“CAWR”);
- the reporting of injuries, diseases and dangerous occurrences (“RIDDOR”);
- the classification, packaging and labelling of dangerous substances (“CHIP”);
- the transportation of dangerous substances;
- the management of health and safety at work (“MOHS”);
- the provision of health and safety information to employees;
- the safe use of work equipment (“PUWER”);
- ergonomics;
- the use of personal protective equipment; and
- construction work site safety.

There is no statutory duty to carry out health and safety audits. However, in practice many British employers consider that health and safety audits are a necessary and appropriate means of ensuring that their general duties are satisfied. There is also a growing trend in Great Britain towards the use of risk assessment techniques with the requirement for a general risk assessment embodied in the 1999 *Management of Health and Safety at Work Regulations*. This is coupled with a duty (found in the same regulations) to monitor and review preventive and protective measures. More specific risk assessments are also required in other regulations, including those involving exposure to substances hazardous to health, asbestos, lead, noise, manual handling and display screen equipment.

### **Health and Safety**

The HSC has now published its Strategy for Workplace Health and Safety in Great Britain to 2010 and beyond. The strategy builds on the Revitalizing Health and Safety Strategy which they issued in June 2000.

The HSC have selected eight priority programs:

- falls from height;
- workplace transport;
- musculoskeletal disorders;
- stress;
- construction;
- agriculture;
- health services; and
- slips and trips – working with local authorities.

Forthcoming health and safety legislation or developments includes:

- proposals to amend the *Control of Major Accident Hazards (COMAH)* to implement *EC Directive 2003/105/EC* (the Seveso II Directive). This represents a broadening of the Directive, rather than a major revision. It takes account of recent accidents in the EU and the results of studies into certain dangerous substances;
- ongoing development of standards of good management practice to tackle work related stress;
- implementation of new *Control of Noise at Work Regulations*, implementing the *Physical Agents (Noise) Directive (2003/10/EC)*. Also the new *Control of Vibration at Work Regulations*, implementing the *Physical Agents (Vibration) Directive*;
- implementation of new *Export and Import of Dangerous Chemicals EC Regulations* to implement the Rotterdam Convention.

The *Control of Asbestos at Work Regulations (CAWR 2002)* introduced an explicit duty to manage asbestos in non-domestic premises which come into force on 21 May 2004. The duty to manage falls on all those who have responsibility for the maintenance and/or repair of non-domestic premises. The extent of the legal duty is determined by the terms of any tenancy agreement or contract that applies, and in the absence of any such agreement, on the degree of control the party has over a premises. The dutyholder may therefore be the landlord, tenant or a managing agent, or responsibility could be shared between two or more parties.

The duty requires reasonable steps to be taken to determine the location and condition of asbestos containing materials (ACMs) and an assessment be undertaken as to the risk of anyone being exposed to fibers from them. A management plan must also be drawn up and regularly monitored and renewed. The Regulations also include a duty to co-operate, which applies widely. For example, a surveyor or architect who has plans showing the whereabouts of ACMs would be expected to make them available to the dutyholder at reasonable cost.

### **Enforcement of H&S Regulations**

There appears to be a noticeable increase in the number of prosecutions for violation of both health and safety legislation. Case law is developing rapidly in the EH&S field. The issue of personal liability is very much in the news. The director of an engineering company was convicted of failing to ensure the safety of an employee in 2004 after an excavating machine, which the employee was driving, overturned resulting in his death. In another example, the director of a limited company who neglected to take reasonably practicable measures to ensure the safety of a contractor who fell to his death through a plastic roof light, was prosecuted. While these penalties are not yet typical for EH&S breaches, they do indicate the increasing seriousness with which issues of human safety and to a somewhat lesser extent, environmental protection are being viewed by the courts. A statutory offence of corporate manslaughter has made little progress since the consultation in 2000. However, the reform of the legislation regarding the sanctions that can be taken against individual directors was a Labor Party manifesto commitment, so this issue will likely emerge again. Health and safety fines are lower than environmental proposals supported by the HSE to regularize them and to provide for imprisonment.

### **Administrative Actions**

EH&S regulators have a wide range of enforcement measures other than prosecution for a criminal offence available to them.

In the health and safety field, the main measures are "improvement notices" and, in the case of a risk of serious personal injury, "prohibition notices". An inspector will have grounds to serve an improvement notice where there has been a contravention of a "relevant statutory requirement" (most of the regulations referred to in this protocol are "relevant statutory requirements" for enforcement purposes) or there has been a contravention in circumstances which make it likely that the contravention will continue to be repeated. The notice will specify when the contravention must be remedied. Auditors should check to see that the notice has been complied with, as it is a criminal offence to fail to do so. "Prohibition notices" do not actually require a belief that a provision has been contravened as they are served in anticipation of danger. As such, they can take effect immediately and require the stopping of work. Inspectors may serve

notices and also decide to prosecute. There is provision for appeal against improvement and prohibition notices.

There is a register on the HSE web site of all improvement and prohibition notices issued by HSE since April 2001. If using this register, great care needs to be taken with the corporate name being searched, as the website is not always consistent in how it names the company concerned. The HSE have publicly stated that officers should now be spending less time on enforcement and more working with companies on improving health and safety performance (switching from a 60:40 to 40:60 enforcement improvement ratio).

## **Manufacture or Importation of New Substances**

### **Overview**

This section broadly discusses requirements in the United Kingdom for the notification of chemical substances and preparations, including related requirements pertaining to packaging and labelling; material safety data sheets; and reporting obligations. Outside the scope of this discussion are the more specialized requirements pertaining to new drugs and medicines, and genetically modified organisms.

As a member state of the European Union (EU), UK chemical control legislation consists mainly of laws and regulations that implement legislation put forth by the EU. Most major chemical control legislation implemented by the UK is applicable to England, Scotland and Wales, whereas Northern Ireland may issue its own laws in some cases.

### **Definition**

The *Notification of New Substances Regulations (NONS)* defines a substance as a chemical element or compound in the natural state or obtained by any production process, including any additive necessary to preserve the stability of the product and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.

Dangerous substances are further defined as those which conform to one of the categories of danger referred to in Column 1 of Part I of Schedule 1 of the *NONS* and having the characteristics described in the corresponding entry in Column 2 of that schedule. These characteristics, which are further described in Part II of the Schedule, are described as explosive, oxidizing, extremely flammable, highly flammable, flammable, very toxic, toxic, harmful, corrosive, irritant, sensitizing, carcinogenic, mutagenic, toxic to reproduction, and dangerous to the environment.

## Notification Requirements

New chemical notification requirements are governed in the UK by the *Notification of New Substances Regulations (NONS) 1993* (as amended through 2002). The regulations implement within the United Kingdom those provisions of *Directive 67/548/EEC*, as last amended by *Directive 2001/59/EC*, concerning the manufacture and import of new substances.

Notification must be submitted to the competent authority before a substance is placed on the market, i.e. made available to third parties in the United Kingdom. Within the UK, the Secretary of State for the Environment and the Executive (e.g. the Health and Safety Executive's Data Appraisal Unit) acting jointly has been designated as the competent authority within the *NONS Regulations*. For substances manufactured within the UK, the manufacturer provides the notification. For substances manufactured outside of the EU, the notification must be provided by either the importer, by the person in UK who actually places the substance on the market, or by the person designated by the manufacturer as the manufacturer's sole representative in the EU to provide notification.

The EU *Dangerous Substances Directive (67/548/EEC)* governs the notification of new substances uniformly throughout the European Union. The notification provisions of the *Dangerous Substances Directive* generally require that 'new' substances entering the European market first undergo rigorous testing and that the result of such tests be submitted to one of the designated competent authorities. Excluded from the scope of new substances are "existing substances", which include chemicals listed on the European inventory of existing commercial chemical substances (EINECS). Substances appearing on EINECS, while exempt from the obligation to notify, are nevertheless subject to classification, labelling and packaging provisions. Substances for exclusive use in foodstuffs, medicinal products, and any other substance for which comparable EU notification and approval procedures exist are likewise exempt from the requirement to notify.

## Safety Data Sheets

The use of Safety Data Sheets (SDSs) is regulated in the EU by *Directive 91/155/EEC*, last amended by *Directive 2001/58/EC*. The primary impact of this amendment is the new requirement for SDSs to be provided for preparations (mixtures) that are not classified as hazardous but contain 1% or more of a substance that poses a health or environmental hazard or for which a Community workplace exposure limit exists. The use of SDSs in the UK is governed by the *CHIP 3 Regulations*, which implements *Directive 2001/58/EC*.

A safety data sheet is required regardless of how the chemical is supplied (i.e., in bulk or in packages) if the chemical is to be used in connection with work, unless the chemical is sold for public use through shops. Regulation 5 of the *CHIP 3*

*Regulations* now provides more guidance on what information must be included on the SDS. Schedule 4 provides the sixteen required headings on the SDS: 1) Identification of the substance/preparation and company/undertaking; 2) Composition/information on ingredients; 3) Hazards identification; 4) First aid measures; 5) Fire-fighting measures; 6) Accidental release measures; 7) Handling and Storage; 8) Exposure controls/Personal protection; 9) Physical and chemical properties; 10) Stability and reactivity; 11) Toxicological information; 12) Ecological information; 13) Disposal considerations; 14) Transport information; 15) Regulatory information; and 16) Other information.

The implications of the requirements established by the abovementioned legislation are elaborated on within the non-binding Approved Code of Practice on the Compilation of Safety Data Sheets (Third edition). The SDS headings set out in the regulations and in the Approved Code of Practice are identical to those required in the EU SDS Directive.

### **Reporting Obligations**

Once notification has been made to the UK HSE Data Unit, manufacturers and importers of substances have a continuous obligation to report to the Data Unit of any changes in the annual or total quantities of the substance placed on the market by them. Also reportable is new knowledge obtained regarding health and environmental effects of the substance, new uses of the substance, any change in the composition of the substance and any change in status as manufacturer or importer.

### **Other Useful Information**

#### **List of Key Agencies**

Note: The country code for Great Britain is 44.

#### **Central Government Authorities**

The following are headquarters or central office addresses:

Department for Environment, Food & Rural Affairs  
Nobel House  
17 Smith Square  
London  
SW1P 3JR  
Tel: 020 7238 6000 (switchboard)

Environment Agency  
Rio House  
Waterside Drive  
Aztec West  
Almondsbury  
Bristol  
BS32 4UD  
Tel: 01454 624400  
Fax: 01454 624409

Scottish Environmental Protection Agency  
Erskine Court  
Castle Business Park  
Stirling  
FK9 4TR  
Tel: 01786 457700  
Fax: 01786 446885

Health and Safety Commission/Health and Safety Executive  
Rose Court  
2 Southwark Bridge  
London  
SE19 9HS  
Tel: 020 7556 2100  
Fax: 020 7556 2102

HSE Infoline (Monday to Friday, 8.30am to 6pm)  
Tel: 08701 545500  
Fax: 02920 859260

### **Sources of Regulatory Information**

Copies of statutory instruments and related regulatory information can be obtained through the following:

- Her Majesty's Stationery Office (HMSO)

<http://www.hmsso.gov.uk>

on-line information

– The Stationery Office

<http://www.tso.co.uk/bookshop>

on-line ordering

0870 600 5522

telephone ordering

TSO Scotland  
71-73 Lothian Road  
Edinburgh EH3 9AZ  
Tel: 0870 606 5566

TSO London  
51 Nine Elms Lane  
London SW8 5DR  
Tel: 0207 873 8787

TSO Wales  
18-19 High Street  
Cardiff CF10 1PT  
Tel: 02920 821361

TSO  
PO Box 29  
St. Crispins  
Duke Street  
Norwich NR3 1GN

The Parliamentary Press  
Mandela Way  
London SE 1 5SS  
Tel: 0207 394 4200

TSO Ireland  
16 Arthur Street  
Belfast BT1 4GD

– Health and Safety Commission/Executive Publications

HSE Books  
PO Box 1999  
Sudbury  
Suffolk  
CO10 2WA  
Tel: 01787 881165

HSE Information  
Caerphilly Business Park  
Caerphilly CF83 3GG  
Tel: 08701 54500  
Fax: 02920 859 260

Fax: 01787 313995

– Department of Environment Food and Rural Affairs (DEFRA)

Publications issued by DEFRA can be ordered as follows:

DEFRA

Publications Sales

Admail 6000

London

SW1A 2XX

Tel: +44 20 8694 8862 from outside the UK

Tel: 08459 556000

E-Mail: [defra@iforcegroup.com](mailto:defra@iforcegroup.com)

There are also two useful publications that provide regulatory information, with one covering environmental (Garner's), and the other health and safety (Croners). These references are noted as follows:

Garner's Environmental Law  
LexisNexis UK  
Customer Services  
2 Addiscombe Road  
Croydon CR9 5AF  
Tel: 020-8662-2000

Garner's provides full-texts of statutory instruments involving environmental matters. The compendium is updated bi-monthly.

Croner's Health and Safety at Work  
Croner Publications Ltd (Publishers)  
Croner House  
145 London Road  
Kingston on Thames  
Surrey  
KT2 6SR  
Tel: 0208 547 3333  
Fax: 0208 457 2637

Lastly, the DEFRA, EA and HSE provide various information through the internet.  
The DEFRA's home page can be found at the following address:

<http://www.defra.gov.uk/>

The EA's home page is as follows:

<http://www.environment-agency.gov.uk>

The Health and Safety Executive home page can be found at:

<http://www.hse.gov.uk>

#### **Other Contacts**

Embassy of the United Kingdom  
3100 Massachusetts Avenue, N.W.  
Washington, D.C. 20008  
Tel: (202) 588 7800 (202) 898-4255

U.S. Embassy  
24/31 Grosvenor Square  
London, W1A 1AE England  
Tel: 020 7499-9000

U.S. Department of State  
Country Desk Officer, United Kingdom  
Tel: (202) 647-8027

U.S. Department of Commerce  
Int'l Trade Admin., United Kingdom  
Washington, DC  
Tel: (202) 482-3748

The American Chamber of Commerce in the UK (AMCHAM (UK))  
75 Brook Street  
London  
England  
W1Y 2EB  
Tel: 020 7493-0381  
Fax: 020 7493-2394

### Public Holidays

National holidays are noted as follows; this is a working guide only. Dates should be verified prior to undertaking any visit. When holidays fall on a Saturday or Sunday, commercial establishments may be closed the preceding Friday or the following Monday. Information shown under the column "Variable Date" reflects the specified date in 2004.

<u>Holiday</u>	<u>Fixed Date</u>	<u>Variable Date</u>
New Year	January 1	
Good Friday		April 9
Easter Monday		April 12
Bank Holiday		May 3
Bank Holiday		May 31
Bank Holiday		August 30
Christmas Day	December 25	
Boxing Day	December 26	

The following UK website that identifies public holidays:  
<http://www.dti.gov.uk/er/bankhol.htm>

**Figure 1-1**  
**Map of Great Britain**



**Table 1-1**

**List Of Political Subdivisions**

**England**

Counties

Bedfordshire  
Buckinghamshire  
Cambridgeshire  
Cheshire  
Cornwall  
Cumbria  
Derbyshire  
Devon  
Dorset  
Durham  
East Sussex  
Essex  
Gloucestershire  
Hampshire  
Hereford  
Hertfordshire  
Kent  
Lancashire  
Leicester  
Lincolnshire  
Norfolk  
Northamptonshire  
Northumberland  
North Yorkshire  
Nottinghamshire  
Oxfordshire  
Rutland  
Shropshire  
Somerset  
Staffordshire  
Suffolk  
Surrey  
Warwickshire  
West Sussex  
Wiltshire  
Worcestershire

Metropolitan Counties

Greater Manchester  
Merseyside  
South Yorkshire  
Tyne and Wear  
West Midlands  
West Yorkshire

**Scotland**

Local Councils

Aberdeen City  
Aberdeenshire  
Angus  
Argyll and Bute  
Clackmananshire  
Dumfries and Galloway  
Dundee City  
East Ayrshire  
East Dunbartonshire  
East Lothian  
East Renfrewshire  
Edinburgh, City of  
Falkirk  
Fife  
Glasgow City  
Highland  
Inverclyde  
Midlothian  
Moray  
North Ayrshire  
North Lanarkshire  
Perth and Kinross  
Renfrewshire  
Scottish Borders  
South Ayrshire  
South Lanarkshire  
Stirling  
West Dunbartonshire  
West Lothian

Island Areas

Orkney  
Shetland  
Western Isles

## **Wales (Counties)**

Blaenau Gwent  
Bridgend  
Caerphilly  
Cardiff  
Carmarthanshire  
Ceredigion  
Conwy  
Denbighshire  
Flintshire  
Gwynedd  
Isle of Anglesea  
Merthyr Tydfil  
Monmouthshire  
Neath Port Talbot  
Newport  
Pembrokeshire  
Powys  
Rhonda Cynon Taff  
Swansea  
The Vale of Glamorgan  
Torlaen  
Wrexham