

Natural Resources Wales
Chester Road
Buckley
Flintshire
CH7 3AJ

04th May 2016

Dear Matthew

**The Environmental Permitting Regs 2010
Permit Reference: YP3732LZ (BM4848IY)
Summary Report of Annual Improvement Targets**

As required in condition 4.1.4 of permit YP3732LZ (BM4848IY), detailed below is a summary of Prysmian Cables & Systems Ltd, Wrexham, annual improvement targets and results for 2015. The specific improvement targets are generated within the framework of our ISO 14001 environmental management system certificated by UKAS approved certification body, SGS.

During August 2015, the management system was re-audited for compliance to ISO 14001:2004 and was undertaken by SGS. During this audit the EMS was found to be compliant to the standard with one non-conformity identified. The non-conformity was addressed immediately during the audit to the satisfaction of the auditor. Further improvements have been planned to ensure continued compliance.

The UK Prysmian Group is committed to the reduction of the environmental impact of its activities. To demonstrate this commitment Prysmian joined the Achilles CEMARS programme and has a certified Carbon Footprint to the ISO14064-1:2006 standard. The latest audit for this was completed in December 2014. The certified Company report shows a reduction in absolute tCO₂e of 4% compared to the base year and this is largely due to the consolidation of the UK manufacturing sites of which Wrexham has contributed a significant part. The Company has an objective to achieve 5% by 2016 and so is on track.

The company approach is to set annual environmental objectives in 5 categories as listed below;

- Compliance with legislation
- Energy and Water Usage
- Waste Management, Recycling and Yield
- Employee Training / Communication / Awareness
- Risk assessments / reduction, housekeeping and improvements

A description of the main aspects of the achievements of the Wrexham site against each of these categories follows:

1. Compliance with legislation

The Wrexham site maintains a register of relevant environmental legislation and the level of compliance is determined from an annual Compliance Evaluation and from any other audit or compliance issues raised during the year. Overall the level of compliance during 2015 was high in all areas of legislation and the objective was largely achieved with no breaches of permitted limits.

No external complaints were filed against the facility and its operations and no near misses were recorded across the site for the year.

However areas of improvements were noted during the recent NRW OMA – Discharges to water audit:

- Documentation of management system procedures for monitoring – The SOP's are supplied by Alcontrol laboratories (UKAS) but supplied SOP's appeared missing for Lead during the inspection.

LER contacted Alcontrol and received the current SOP for water sampling.

- Understanding the requirements of the permit and monitoring methods – MCERTS training may be beneficial (to Local Environmental Representative – LER)

Courses identified by LER and will be booked during the upcoming year.

2. Energy and Water Usage

The Wrexham site has a CCA and therefore has a specific energy target. The monitoring and reporting of the energy is managed by Briars Associates on behalf of Prysmian. The target for the 2015-2016 period was set as 1,942 kWhp/tonne. The cumulative figure achieved at the end of 2015 was 1682 kWhp/tonne. This is within the target set for the year and a 13% improvement.

The water usage at Wrexham is well managed with a recirculation system for process water and this is topped up by collection of water from the roof. The town water consumption continues to be monitored, and any anomalies are reported to the site team for investigation. However, no anomalies have been reported this last year.

3. Waste Management, Recycling and Yield

The effective use of material is a key measure for Prysmian and tight controls are in place to ensure that start up scrap is minimised and that only the minimum amount of material is used for the products consistent with meeting the product specifications. A target for material efficiency is set for each factory and for Wrexham the final result was an increase of 1.35% over usage during 2015 from 1.1% over usage in 2014. This mainly because of an increase in the product variations being produced and a further consolidation of material specification improvements into the 2015 product range.

The waste to landfill was targeted for a 5% reduction for 2015 over the 2014 result. New contracts have been established for the improvement of recycling of waste and a significant improvement was found throughout 2015. An improvement of 29% upon 2014 figures was achieved due to the new recycling streams. 2015 performance was set at 2.04% landfill for all production and the figure of 1.85% was achieved, indicating the target had been met.

4. Employee Training / Communication / Awareness

The training objective has been met by ensuring that all new starters during the year have been briefed and inducted on all aspects of the company including items such as the Company Policies and procedures. This is a formalised process and records of induction training are maintained and audited.

The awareness of the environmental objectives and requirements is maintained by a number of Environmental Team Meetings with representation from all areas of the factory. This awareness is maintained by planned 5S audits which prompt the identification of concerns which could affect the environment.

In a general way, there is an Environmental Notice Board alongside the main pedestrian access to the factory working areas and relevant information has been posted here throughout the year. It is concluded that this training/ awareness objective has been satisfactorily completed.

5. Risk assessments / reduction, housekeeping and improvements

The environmental system is well established and a significant aspect of this now is to maintain the system. This is achieved by setting an objective to carry out 5S housekeeping audits in the offices, factory and external areas of the factory. These have been carried out to plan and thus the objective is achieved.

- Total actions completed 32 versus 50 raised = 64% completion rate.
- Annual average audit score was 84% versus 80% previous year, a sustained 4% improvement.

Opportunities to reduce the risk to the environment are identified and reviewed by the business as part of the management process. Two examples of such improvements are listed below:

- Rear access road and link to shared road. Road repairs completed to minimise any environmental risk that could result in fuel spillage from wagon fuel tanks.
- Implementation of new design of spill kit container for around the perimeter of the external roadways. Design enables the contents to be stored safely awaiting use and ensures the availability of materials in the event of a spillage.

In conclusion, the management review of the performance for 2015 shows that a number of significant objectives have been achieved. These include targets such as the reduction in Company Carbon Footprint and the surpassing the specific energy target. The waste target has proved to be a key improvement for the site, especially Landfill, but the over usage target has been more difficult to achieve in 2015 but actions are in place to try and achieve an improved performance in 2016 subject to the external influences. Thus the EMS has been successful in reducing the impact that the company has on the environment and thus fulfilling the policy statement.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Forsyth', with a long horizontal flourish extending to the right.

Derick Forsyth

HSE Advisor

Email: derek.forsyth@prysmiangroup.com

Direct line: +44 (0)1978662185

Mobile: +44(0)7800715792

c.c.: P Lloyd, Plant Manager, Prysmian Cables & Systems, Wrexham
A J Watt Company Quality and Environment Manager, Prysmian Cables & Systems (Group)