

Natural Resources Wales
Chester Road
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8th April 2014

Dear Aled

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

As required in condition 4.1.4 of permit BM4848IY/YP3732LZ, detailed below is a summary of Prysmian Cables & Systems Ltd, Wrexham, annual improvement targets and results for 2013. The specific improvement targets are generated within the framework of our ISO 14001 environmental management system certificated by UKAS approved certification body, SGS. The ISO 14001:2004 certification was last renewed in August 2012 and has an expiry date of August 2015.

The key focus over the last year has been the closure of a manufacturing site at Derby and the transfer of a number of machines to the other Prysmian sites in the UK. This project has involved the installation of machines at Wrexham. These new machines do not change the type of processes carried out but increase the manufacturing capacity and thus the factory saturation i.e. possible Tonnes/m².

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 certified report shows a reduction in absolute tCO₂e of 6% 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 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 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 2013 was high in all areas of legislation and the objective was largely achieved. However two areas of concern were noted.

- The internal audit found that some waste documents had the SIC code missing. The waste controller now checks this aspect specifically.
- The second concern was a breach of the surface water discharge consent for suspended solids. This was during a period of exceptional rainfall and was affected by run off from the surrounding landscaped areas. To prevent this problem the frequency of sweeping the roadways has been increased.

MONITORING RETURNS N. WAL

CHECKED Vs AUTHORISATION	INITIALS	DATE
TRACING	AZ	17.4.14
OK FOR PUBLIC REGISTER	JB	11.4.14
	JB	3/7/14
	JB	EPDM



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 2013-2014 period was set as 1,957 kWhp/tonne. The cumulative figure achieved at the end of 2013 was 1,575 kWhp/tonne. This is affected by increasing the saturation of the factory footprint and producing more output with the same base load.

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 although a 0.3% improvement was targeted in this measure for Wrexham the final result was a 3.6% reduction.

The waste to landfill was targeted for a 5% reduction for 2013 however the result for the year showed no percentage change from 2012.

Both of these aspects have been adversely influenced by the changing circumstances this past year with the introduction of new machines with associated process commissioning and labour training and it is anticipated that progress will be made next year.

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 on a bi-monthly basis by the 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 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.

Three significant improvement actions to reduce risk have been implemented during the year as listed below:

- The frequency of subcontracted road sweeping has been increased.
- The method of regularly reviewing the spill kits has been revised.
- A bund has been added to the external swarf skip storage area.

In conclusion, the management review of the performance for 2013 records an achievement of just over 80% against the objectives which were set. However, this places no weighting on the significance of the objectives and as described here some major objectives have been achieved such as the reduction in Company Carbon Footprint and the surpassing the specific energy target and 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 'A Watt', followed by a horizontal line.

A J Watt

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