

Rogerstone Park Environmental Management Review Jan 2021 - Dec 2021

Agenda

1. Compliance with the Environmental Permit(s)
2. Conformance with Environmental Policy
 3. CCA and EU ETS Targets
 4. ISO 14001 & Suitability of EMS
 5. Internal Audits
6. Complaints & External Communication
 7. Significant Site Targets
8. Customer requirements (no update for 2021)
9. Internal Communications &/or Incidents
 10. Environmental Project Overview
 11. EMS Summary

Compliance with the Environmental Permit

1.1 No reportable incidents.

1.2 All emissions to air were measured and in compliance.

1.3 The site inspector remains Ian James.

1.4 There were no physical site inspections in 2021. Some actions (two cat 3 minor non-conformances) were raised during the 2020 site visit (from NRW) and were closed out this year.

1.5 A review of the Environmental Permit was undertaken in 2020. Some further information was requested in December 2021 – this information is currently being collated and will be provided to NRW by the agreed submission date.

1.6 It is expected that a new revised Environmental Permit will be received in 2022. This may have further Improvement Conditions to bring the site in line with relevant developments for “Best Available Techniques” within the Food and Drink sector.

Compliance with the DCWW Discharge Consent

1.6 Additional effluent treatment has been investigated for the current set up of the ETP. A Capital project has been approved for the purchase of significant equipment, which will bring the site into compliance with all AELs.

1.7 It is anticipated this equipment will be installed by October 2022. The sewerage undertaker (Welsh Water) continues to be updated with all relevant investigations and changes to the plant.

Conformance with Environmental Policy

2.1 Site remains aligned with its environmental policy

2.2 Environmental induction is still in place and delivered throughout 2021. This educates new starters around the relevance and principles of the environmental policy.

2.3 Conformance with the Environmental Policy tracked on the site compliance plan. This is audited within the ISO14001:2015 system.

Permits and Consents	Average compliance score	%
	EPR Permit LP3035XM	68
	GHG Permit	100
	DCWW Discharge Consent	70
	Climate Change Levy	
Standards	Average conformance score	%
	ISO 14001	78
	Environmental Policy	70
		0

CCA and UK ETS Targets

3.1 The site PASSED the first year of the new fifth target period (Jan 2021 – December 2021). The target required a challenging 5.9% reduction. This scheme is voluntary – 2 year scheme.

The 5th period targets have been provided to site. This means reduction of 5.9% for electricity use. The site will very likely achieve these new targets.

3.2 UK ETS - Non Voluntary participation. Over 20 MW thermal capacity (natural gas). The audit is booked in late February 2021 (calculations submitted for verification end of December 2021).

ISO 14001:2015

4.1 Annual H1 surveillance undertaken March 2021 - 2 Minor NCR's closed out and an 'opportunity for improvement' raise.

4.2 H2 visit was conducted in November 2021 – 2 Minor NCRs were raised. Overall very positive feedback on the direction the EMS is now taking.

4.3 Site EMS will gradually migrate towards group format over the course of the next few years; (although several group procedures and policies are in place as site owned documents currently).

Suitability of EMS

4.4 It is considered that the EMS suitably assesses organisational risk, opportunities, sets suitable and relevant objectives and adequately tracks progress towards such targets.

4.5 Opportunities for improvement have been identified to better facilitate the communication of relevant environmental information to interested parties on site.

4.6 Previously it was identified that risks to the robustness of the EMS were identified as the lack of uptake and use of the NCR reporting process (eSis environmental near hits and incidents). Subsequent communication to promote this further was undertaken, and the ISO14001 auditor was pleased to see this form of transparent self policing in place.

4.7. A Minor N/C was raised due to lack of risk assessment of aspects throughout the supply chain (not just site based risks). This reflects the site and division's aims to greater record embedded carbon.

Internal Audits

5.1 A series of internal audits aligned with the 14001 standard have been developed, uploaded onto the paperless audit system and undertaken all actions are logged and tracked on the paperless system.

5.2 A series of audits evaluating performance against our own procedures have been developed and undertaken. Any identified actions are tracked on the eSis action tracker.

5.3. A series of bespoke internal audits continue to be undertaken through the site KSR process.

Complaints & External Communication

6.1 There were no external communication received, relating to complaints on site. This was verified through the BSI 14001:2015 audit process.

Significant Site Targets

6.1 On track with all site Objectives and Targets.

[illegible]

Meal Solutions

Making Every Meal Moment Special

Significant Site Targets

6.2 Progress against site Objectives and Targets are tracked in the Environmental KPI Spreadsheet.

6.2.1 : Target for 2021 (2% reduction on previous year) has been achieved on total energy combined measurement with a 10.07% reduction, per tonne product produced (this was achieved as grid electric requirement has fallen due to on site CHP). Water target has been achieved also (usage against production tonnage).

Trends in Energy Usage				
Year	Parameter			
	Primary Energy usage	CO ₂ produced	CO ₂ per unit output	
2019	135570	25,204	0.85	↓
2020	137865	25,887	0.93	↑
2021	139,047	26,090	0.83	↓

Water Source	Usage (m ³)	Specific Usage (m ³ /t)	
<u>Mains water</u>			
2019	748920	25.28	↓
2020	767,491	27.68	↑
2021	803,396	25.57	↓

Internal Communications &/or Incidents

9.1 Some 'incidents' and non conformances were raised against breaches of the Welsh Water trade effluent discharge consent. An escalation of the situation was raised with site management in late 2020. Further investigations were undertaken in 2021 and capital is assigned for 2022.

9.10 There were no other significant incidents or internal communications of note.

Environmental Project Overview

10.1 In 2021 the heat recovery element of the Combined Heat and Power plant was realised; by heating LPHW. It is estimated this has brought a saving of between 5MWh & 7.7MWh.

10.2 Factory Wide 'Operation Excellence' project – structured improvement plan to drive efficiencies through production lines. Faster outputs, reduced manning, longer run, optimal scheduling to reduce waste (50% volume is now planned to run down nominated fewer lines). Daily weekly waste management processes has shown a significant reduction of food waste.

10.3 LED lighting project ongoing (replace all existing old fittings end of life). Phased replacement of office lighting in production area to be LED.

10.4 Ammonia compressors replaced – energy efficiency improvements.

10.4 Significant research in upgrading existing effluent treatment plant – bottle neck at DAF stage of treatment. Money assigned to 2022.

Environmental Management System Summary

11.1 During 2021 the structure of the EMS is now fully changed to reflect the various aspects and requirements of the ISO14001 standard.

11.2 Importantly for Rogerstone Park – Meal Solutions (division) has released their Sustainability Strategy, for long term plans toward carbon reduction. These stringent targets will be incorporated into site targets through the EMS.

11.3 We have received positive feedback through the ISO 14001 audits that the EMS is fully compliant with 2015 standard. Some work is required to push the Standard to incorporate Scope 3 emissions through the supply chain.

11.4 Overall it is considered that the system is now highlighting and capturing issues and tracking corrective actions effectively.