

Mr Andi Kemp
Natural Resources Wales,
Rivers House,
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St Mellons,
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31st January 2019

Permit BU2110IS – Permit Condition 4.1.5

Dear Mr Kemp,

Please find below the formal response to Permit Condition 4.1.5 from on behalf of Cabot Carbon which states:

“Where the Operator has a formal environmental management system applying to the Permitted Installation which encompasses annual improvement Targets the Operator shall, not later than 31 January in each year, provide a summary report of the previous year’s progress against such Targets.”

Setting of Objectives and Targets

A procedure is in place which describes the process for the setting of environmental Objectives and Targets which the company aims to meet to facilitate continuous improvement in fulfilment of its Environmental Policy and Management System.

Setting, Monitoring and Tracking Progress

In setting Environmental Objectives and Targets the following areas are taken into consideration:

- Cabot Environmental Policy
- Legal and other requirements
- Significant environmental aspects
- Environmental Permit improvement actions
- Technological options and best practice
- Financial, operational and business requirements (Scorecard)
- Views of interested parties, risks to the business
- Opportunities for continual improvement (short and long term)
- Cabot Barry environmental performance and KPIs, Near Miss, Non-Conformances

Progress towards the Objectives and Targets are discussed at monthly Leadership Team (LT) meetings and/or monitored via the personal Performance Based Management process (i.e. personal objectives and targets). Chaired by the site Facility General Manager and attended by relevant functional heads, the site scorecard and incentive plan performance is reviewed at the LT meetings and minutes/actions recorded and tracked.

In lieu of an annual ISO Management Review meeting, monthly LT meetings are main forum for detailed discussion of Environmental Management including progress of, or changes that may affect the performance of the EMS and associated objectives and targets.

Environmental objectives and targets often form part of the site scorecard and the site incentive plan and often cascade through to individual employee goals and objectives. These initiatives raise environmental awareness and help to drive continual environmental improvement across the site.

We continue to seek opportunities to improve our environmental performance through the application of the site ISO 14001 system. From 29th-31st May 2018, Cabot Barry was subject to a 3-day audit as part of the ISO 14001 Environmental Management System certification. The Barry site was successfully re-certified to the new 14001:2015 standard with zero major and zero minor non-conformances. A copy of the audit report was sent on 28th September 2018 as part of CAR_NRW0033500 response.

Key objectives for the year included finding a recyclable alternative for a kerosene degreaser used in Maintenance Workshop.

Cabot continues to build on the success of diverting off quality silica away from landfill and into a re-use option with a company that manufactures polymeric rubber compound, displacing Titanium Dioxide, a component in their formulation. This has had a positive impact on waste to landfill with a further 96 MT diverted in 2018 of Barry site product.

During the past year we have successfully worked with a key customer that use prime M5 for their application but are not sensitive to product contamination. It was posited that we could potentially switch an amount of the prime M5 to M5S (off spec), therefore freeing up M5 prime for other more sensitive customers. Trials were successful, and this has had a positive impact on total waste to sent to landfill. The key customer now uses off spec (black spec count) material which would otherwise be destined for landfill thereby diverting over 55 MT from landfill fate.

Site waste recycle rates have further improved in 2018 with incremental improvements year on year.

YR	Total (MT) Waste	Grand Tot Recycle %
2018	494	65
2017	318	54
2016	692	38
2015	390	34

As a site we continue to look for opportunities to reduce waste and improve our processes to improve our environmental performance. New initiatives at the start of FY19 include promotion of 5S which takes into consideration our internal environment, efficient use of office spaces, QA laboratory, WPS and other areas across the plant. Through a housekeeping and inspection programme, cleaning up and organizing the workplace in its existing configuration encourages our employees to improve their working conditions (including safety and ergonomics) and helps them to understand the importance of waste reduction and its contribution to environmental performance.

We await recommendations from the recent ESOS audit so that we can explore opportunities to reduce energy.

I hope that this report satisfies the annual Objectives and Targets reporting requirements of section 4.1.5 of our environmental permit BU2110IS. If you should have any further questions arising from the report, then please do not hesitate to contact me.

Yours sincerely,



Paula Lloyd

SHEQ Manager

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