

Cogent Power Ltd.
Orb Electrical Steels,
Stephenson Street,
Newport,
NP19 0RB
14th February 2019

Industry and Waste Regulation Team
Taff & Ely
Rivers House
St Mellons Business Park
Fortran Road
St Mellons
Cardiff CF3 0EY

Permit Ref:- CP3333BQ

Please accept this report as fulfilment of requirement PC 4.1.5 EMS Review.

On June the fourth and fifth Orb Electrical Steels went through an audit to transition to the new ISO14001:2015 and ISO9001:2015 standards. The audit was carried out by our external certifying body Bureau Veritas, both days of these audits proceeded without any non-conformities raised.

Bureau Veritas Certification Ltd. were again on site at the end of September to undertake a four day surveillance audit of our Integrated Management System, incorporating ISO14001:2015, 9001:2015 and BS OSHAS 18001:2007. Again this audit produced a good result with no major non-conformances raised. All actions have since been closed.

On the following page is the business "Environment Scorecard" that is used as a measure of our environmental performance against our environmental objectives, please note this is for the year to date for the Financial Year 2018-19.

Cogent Power Ltd.

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TATA STEEL



Cogent Power Ltd - Orb Electrical Steels
Environment Scorecard 2018 - 2019

Parameter	Unit	Actual 2015-16	Actual 2016-17	Actual 2017-18	Target 2018-19	January	Actual YTD	Predicted	Comments
Permit Compliance	%	100.0	99.0	100.0	100.0	100.0	99.6	99.7	Last breach - 21/7/19, oil 149ppm
Landfill	tonnes	1,960.1	1,702.6	1,564.9	1,408.4	21.3	700.8	841.0	Filtercake has now been diverted to Landfill from February
Recovered Wastes	tonnes	1,204.2	666.5	960.7	1,056.8	231.6	2,055.9	2,467	
Water	m ³	468,411	461,947	422,750	401,613	25,544	325,380	390,456	
Energy / HTCA tonne	kWh/t	2,900	2,958	3,214	2,900	3,563	3,284	3,284	Low HTCA tonnage
Oil Usage	litres	575,258	445,991	523,424	497,253	58,071	473,643	568,371	9.51 litres / tonne.

On Target
>90% of Target
<90% of Target

Upcoming Issues

- Permit compliance – One breach of consent for oil during the fiscal year to date, 21st July 2019, this was the first breach since September 2016.
- Landfill – objective for 10% reduction year on year. We are predicted to reduce our landfill tonnage by 46% based on 2017-18 result, beating our target by approximately 570 tonnes. This target has been achieved as a result of sending our filter cake to Tata Steel at Port Talbot for recovery and iron and use in bricks.
- Recovered Waste – The project sending our filter cake to Port Talbot has resulted in an increase in recovered wastes of ~1,500 on the previous year. Other recovered wastes include waste shot dust.
- Water – Objective of 5% reduction year on year, it is predicted that we will reduce our consumption this year by approximately 7 – 8%, which is better than target.
- Energy – It is very unlikely that this target will be achieved. 2018-19 has seen a massive turnover in employees, this has been caused by changes to employee pensions, which has enabled many to retire early. This has effected the plant capability and as such has seen a much reduced throughput through the plant.
- Oil usage – Once again we are unlikely to meet our objective for oil consumption, due to plant performance and the age of our rolling mills resulting in increased losses

Yours sincerely,

N. Webb MRSC, PIEMA, ProfGradIOMMM