

Compliance Assessment Report CAR_NRW0043252

Permit being assessed: NP3030BJ.

For: Enersys Newport , **held by:** Enersys Ltd

At: Enersys Ltd , Stephenson Street , Newport, Newport, NP19 4XJ.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 25/01/2024.

Parts of permit assessed: 4.2.2 Annual Reports 2023.

NRW Lead Officer: Rebecca Green.

Report sent to: Kate Davies, Environmental Lead, on 16/02/2024.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1C - Management - Energy Efficiency	Assessed (A)	
IR1D - Management - Efficient use of raw materials	Assessed (A)	
IR3A - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3E - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Information - Reporting	Assessed (A)	
IR1E - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Forms A1, Emissions to Air, 1st October - 31st December and 1st January - 31st December 2023; W1, Emissions to Water, 1st October - 31st December and 1st January - 31st December 2023; S1, Emissions to Sewer, 1st October - 31st December and 1st January - 31st December 2023; R1, Waste Disposal and Recovery 2023; WU1, Water Usage 2023; E1, Energy Usage 2023 and PI1, Performance Indicators 2023 were all received on 25th January 2024.

All the reports are accepted.

W1, Emissions to Water

1st Oct - 31st Dec 2023: All parameters were within their respective emission limit values (ELV).

1st Jan - 31st Dec 2023: All parameters were within their respective ELVs.

Air 1, Emissions to Air

1st Oct - 31st Dec 2023: All parameters were within their respective ELVs.

1st Jan - 31st Dec 2023: All parameters were within their respective ELVs.

S1, Emissions to Sewer

1st Oct - 31st Dec 2023: All parameters were within their respective ELVs.

1st Jan - 31st Dec 2023: All parameters were within their respective ELVs.

R1, Waste Disposal and Recovery 2023

Total waste generated in 2023 was less than in 2022 and about the same per tonne of production (ptp).

The amount sent for disposal was lower than in 2022 and about 10% lower ptp.

Less waste was sent for recovery but the amount ptp was similar to that in 2022.

Total hazardous waste generated in 2023 was less than in 2022 and about the same ptp. The amount sent for disposal was lower, reducing by about 9% ptp.

Less hazardous waste was sent for recovery, but about the same ptp as in 2022. Total non-hazardous waste generated was less than in 2022 but slightly higher ptp. Non-hazardous waste sent for disposal was lower than in 2022 and about 20% less ptp.

The amount sent for recycling was less than in 2022, increasing slightly ptp.

WU1 Water Usage 2023

The total amount of water used was more than in 2022, increasing by almost 60% ptp. This was due to the re-siting of a cooling water discharge pipe in Q4. The system was modified and no longer discharges such high volumes, (see CAR_NRW0042811). This high increase is probably an anomaly.

E1 Energy Usage 2023

The total amount of energy used in 2023 and the resultant CO₂ were less than in 2022. However, energy usage increased by almost 18% ptp and the associated CO₂ emissions were about 15% higher.

Performance Indicators 2023

The performance indicators for energy, waste and water are discussed above.

Production decreased by about 18% in 2023.

The total mass releases of lead were about 30% higher ptp than in 2022. EnerSys calculate the annual mass release from the emission results. In one quarter in 2023 they were higher than usual for some emission points, though still compliant with the ELV. Emissions will be tracked monthly in 2024 so that action can be taken to address any unusual trends.

The continuing reduction in waste generation is encouraging and the installation of the cold cubing system should help to reduce energy consumption in 2024. It is difficult for a manufacturer, such as EnerSys, to maintain reductions in resource use when production levels fall. Natural Resources Wales appreciate the efforts that EnerSys make to reduce consumption, including their capital investments and hope that they will see the benefits in 2024.

END.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.