



Rogerstone Park Environmental Management Review Jan 2023-December 2023

Agenda

1. Compliance with the Environmental Permit(s)
2. Conformance with Environmental Policy
3. CCA and UK ETS Targets
4. ISO 14001 & Suitability of EMS
5. Internal Audits
6. Complaints & External Communication
7. Significant Site Targets
8. Internal Communications &/or Incidents
9. Environmental Project Overview

Compliance with the Environmental Permit

1.1 No reportable incidents.

1.2 Air Emissions – no exceedances were noted from the stack testing, which was completed in December 2023.

1.3 The site inspector remains Ian James.

1.4 There were no physical site inspections in 2023.

Compliance with the Environmental Permit

1.5 An application for the variation of the current Environmental Permit was submitted in December 2023. This is in relation to the upgrade of the internal cooking process area. A new emission point has been included for the function of heating thermal oil for the process. This new Babcock Wanson thermal heater is rated at 698kWh and therefore falls below the requirements of the Medium Combustion Plant Regulations.

There is no requirement for additional water usage.



Compliance with the DCWW Discharge Consent

1.6 – There were no exceedances of the discharge consent in 2023.

The work that was undertaken to upgrade the ETP in 2022/2023 has addressed the pH levels. All parameters are compliant for calendar year. The ETP upgrade has increased potential future capacity throughput – although this is not required currently.



Compliance with the DCWW Discharge Consent

1.6 - Since the installation of the additional effluent treatment (August 2022), the site continues to demonstrate much improved compliance with all discharge consent AELs.

1.7 – The additional DAF treatment stage also provides increased throughput capacity which is relevant for contingency and emergency situations (previously relied on bypass).



Conformance with Environmental Policy

2.1 Site remains aligned with its environmental policy.

2.2 Environmental induction is still in place and delivered throughout 2023. 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.

2.4. Group had issued request that Rogerstone Park create a site specific add on to the issued group wide Environmental Policy. This was created and approved in March 2023.

CCA and UK ETS Targets

3.1 The 2023 calendar year is not included in any target period.

The 6th period targets have been provided to site. This means reduction of 6.67% (from a 2018 baseline) for electricity use. The site will very likely achieve these new targets. This scheme is voluntary.

*Please note, this information has not been submitted at the time of this information collation – however, the site is set to comfortably pass the targets set, due to the success of the CHP. Compliance with the scheme for the sixth target period is worth approximately [REDACTED] over the next two years.

3.2 UK ETS - Non Voluntary participation. Over 20 MW thermal capacity (natural gas). The audit was undertaken in October 2023 and calculations were submitted for verification mid-January 2024.

ISO 14001:2015

4.1 Annual surveillance audits were undertaken in May and November- 2 Minor NCR's were raised and subsequently closed out and three 'opportunity for improvements' raised.

4.2 A change management procedure (ENV025) was implemented in 2023.

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 issues are tracked on the non-conformance and corrective action process.



Complaints & External Communication

6.1 A communication regarding a “*continual noise of high pressure venting of steam/air*” was received to site from NRW, regarding a noise event reported on the 15th December 2023.

An internal investigation showed the loss of air on site was caused because the factory air dryers had tripped out (due to the temporary dip in power from the grid – which was identified as the root cause). It’s a safety feature that air is vented when this happens.

As with any complaint or communication, the process followed on site did not identify any preventative and corrective actions to stop a recurrence. We believe the risk of recurrence is low, given there is no recorded occurrence of this in the site’s operation.

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Significant Site Targets

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

7.2 : Target for 2023 electricity (2% reduction (kWh per T) against 2022) has been achieved this year

7.3 : Target for 2023 gas (2% reduction (kWh per T) against 2022) has not been achieved this year.

7.4 Target for 2023 water (2% reduction (m³ per T) against 2022) has not been achieved this year.

Trends in Energy Usage		
Year	Parameter	
	Electricity usage	
2022	kWh (5,460,300)	
2023	kWh (4,562,200)	↓

Trends in Energy Usage		
Year	Parameter	
	Gas usage	
2022	kWh (121,100,751)	
2023	kWh (125,543,851)	↑

Trends in Energy Usage		
Year	Parameter	
	Water m ³	
2022	795,735	
2023	825,739	↑



Internal Communications &/or Incidents

8.1 No non conformances of the TE consent (effluent discharge) occurred in 2023.

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

Environmental Project Overview

9.1 LED lighting project ongoing (replace all existing old fittings end of life). All roof void lighting now replaced, as well as dispatch area.

9.2 Implement steam boiler oxygen trim automation as per ESOS recommendation – this CAPEX has been approved and is due to be fitted in February 2024.

9.3 Environment Manager appointed in November 2023.