



KRONOSPAN LIMITED
Chirk
Wrexham
LL14 5NT
Tel: 01691 773361
www.kronospan.co.uk

Mrs Anna Griffiths
Principal Permitting Officer
Natural Resources Wales
Cambria House
Cardiff
CF24 0TP

Ref:
CR/NRW/19/02

Telephone Number:
01691 775257

Date:
2nd July 2019

Subject: Response to Schedule 5 Notice dated 28 May 2019 – Permit Holder for Part B activities

Dear Anna

Further to your e mail dated 11 June 2019 and our telephone discussion with yourself and Julia Frost on Wednesday 19 June 2019 we respond as promised.

When we consider the factors to help decide if somebody has sufficient control then I comment as follows:

- 1) **Manage site operations through having day-to-day control of plant operations, including the manner and rate of operation** -Kronospan Limited is the dominant company on site with Kronoplus Limited and Kronospan Sawmilling Limited being very much subsidiary operations. Kronoplus Limited Directors (currently Ludwig Scheibltreiter and Mark Jones) are employees of Kronospan Limited. Kronospan Sawmilling Limited Directors (currently Justin Morris, Chris Emery and Teresa Mitchell) are employees of Kronospan Limited. All employees carrying out the operations of the two companies (currently 50 in the Kronoplus Limited operations and 30 in the Kronospan Sawmilling Limited operations) are employed by Kronospan Limited which in total employs 620 people. In addition all computer systems on site are operated by Kronospan Limited. Kronospan Limited is also responsible for purchasing and finance activities.

- 2) **Ensure that permit conditions are effectively complied with-** The Environmental Management System (EMS) (ISO14001), H&S (18001) and Quality (9000) certifications covers the whole site and are the responsibility of Kronospan Limited's Environmental Health and Safety Department
- 3) **Decide who holds key staff positions and have incompetent staff removed** - Kronospan Limited's HR function is responsible for appointing employees and removing them when necessary.
- 4) **Make investment and/or financial decisions affecting performance of the facility** – Due to its dominant position all investment decisions are referred to Kronospan Limited's finance function.
- 5) **Ensure that regulated activities are suitably controlled in an emergency-** This also falls under the responsibility of Kronospan Limited's Environmental Health and Safety Department.

Therefore after taking these factors into consideration we consider that it is appropriate for Kronospan Limited to be the permit holder for the Part B activities.

Yours Sincerely



Chris Ryan
Kronospan Group Secretary