

## Compliance Assessment Report

Report ID:  
CAR\_NRW0035068

This form will report compliance with your permit as determined by an NRW officer

|                              |                                   |             |            |     |       |
|------------------------------|-----------------------------------|-------------|------------|-----|-------|
| Site                         | Pencoed EPR/BX9854IW              | Permit Ref  | BX9854IW   |     |       |
| Operator/Permit holder       | Sony United Kingdom Ltd           |             |            |     |       |
| Regime                       | Installations                     |             |            |     |       |
| Date of assessment           | 16/04/2019                        | Time in     | 13:45      | Out | 15:00 |
| Assessment type              | Audit                             |             |            |     |       |
| Parts of the permit assessed | See Below                         |             |            |     |       |
| Lead officer's name          | Dunn, Karen                       |             |            |     |       |
| Accompanied by               |                                   |             |            |     |       |
| Recipient's name/position    | Ian Prescott / Compliance Manager | Date issued | 03/05/2019 |     |       |

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

| Permit conditions and compliance summary | CCS Category | Condition(s) breached |
|------------------------------------------|--------------|-----------------------|
| A1 - Specified by permit                 | A            |                       |

**KEY:** See Section 5 for breach categories, suspended scores will be indicated as such.

**A** = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

**O** = Ongoing non-compliance, not scored.

|                             |   |                                                              |   |
|-----------------------------|---|--------------------------------------------------------------|---|
| Number of breaches recorded | 0 | Total compliance score<br>(see section 5 for scoring scheme) | 0 |
|-----------------------------|---|--------------------------------------------------------------|---|

If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

## Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

This was a pre-arranged visit:

Ian Prescott – Compliance Manager

### Introductions and Overview

This visit aimed to establish the status of the listed activities on site and the operators plans concerning the environmental permit. The main objective sought to formalise a position concerning the environmental permit in the absence of an application to surrender from the operator. It was the understanding of NRW that the operator was considering the surrender of the permit and advice and guidance had been provided. Discussions with previous site inspectors concerned both the retention and possible surrender of the permit so this visit also sought to establish a way forward.

The operator holds a 'Low Impact Installation' (LII) permit for an activity listed under 'section 4.2 Part A(1)(d) any manufacturing activity involving the use of lead. It was apparent from early discussions that the operator is currently no longer undertaking the permitted activity, as the process has moved to a lead-free paste. Over the last few years the operator wished to retain the permit in the event of a customer requiring such business and this remains the case. A discussion was held regarding the timeframe since lead solder was used at Sony UK Tec (Pencoed) which NRW understands to be approximately 10 years. Initially the retention of the permit was due to the need to cover the 7-year warranty period on a product manufactured with lead solder. A discussion was also held over the requirements in the permit and the onus on the operator to fulfill these requirements while it is still in place. From the visit the operator expressed a wish to retain the permit however this would be discussed further in house.

Following the visit and return to the office the inspector reviewed the conditions of the environmental permit and discussed the position within NRW. The operator is advised following this discussion that 'Section 5 Notifications' permit condition 5.1.3 needs to be made and submitted to NRW. If the permitted activity is to resume notification can then be made in respect of 5.1.3.3

**Action:** Operator to submit written notification in line with condition 5.1.3 concerning the cessation of the permitted process.

The operator provided the annual check against the LII criteria on e-mail after the visit to demonstrate that the installation still falls within scope. The operator clearly demonstrates compliance against the criteria and operates a certified environment management system (EMS) to BSI standard 14001:2015. Although the manufacturing site does not currently undertake the permitted activity reduction of waste and energy consumption takes place and evident on site.

A site tour of the plant was undertaken to view the current layout of the plant and any active emission points. The environment manager gave a very useful and comprehensive overview of current business and manufacturing taking place.

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### Conclusion

This was a useful visit and a very interesting tour of the manufacturing process for the new inspector to get a better understanding of the work on site and the permitted activity. The operator clearly demonstrated compliance with the Low Impact Installation Criteria and evidence for this was provided for NRW records. The inspector was able to provide an update to the operator on NRW and the current re-organisation taking place that involves a proposal for a new south-central area team. The area of Pencoed will fall within the boundary of the new team which is planned to be in place 1 July 2019. It is expected that the site will transfer over to an NRW inspector in the new area team. An action has been placed on the operator to submit in writing a notification of the cessation of the permitted operation due to the process change on site. Should the operator then wish to resume the permitted activity notification can be made to NRW. A deadline for the end of May for the completion of this action has been placed in this Compliance Assessment Report (CAR) form.

{End}

NB/ Please refer to final CAR form on the DMS

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0035068**

**This form will report compliance with your permit as determined by an NRW officer**

|                        |                         |            |            |
|------------------------|-------------------------|------------|------------|
| Site                   | Pencoed EPR/BX9854IW    | Permit Ref | BX9854IW   |
| Operator/Permit holder | Sony United Kingdom Ltd | Date       | 16/04/2019 |

### Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.  
Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

### Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

| Criteria Ref.       | CCS Category | Action required/advised | Due Date |
|---------------------|--------------|-------------------------|----------|
| See Section 1 above |              |                         |          |

## Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

**See our Enforcement and Civil Sanctions guidance for further information**

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

### Non-compliance scores and categories

| CCS category | Description                                                          | Score |
|--------------|----------------------------------------------------------------------|-------|
| C1           | A non-compliance that could have a major environmental effect        | 60    |
| C2           | A non-compliance which could have a significant environmental effect | 31    |
| C3           | A non-compliance which could have a minor environmental effect       | 4     |
| C4           | A non-compliance which has no potential environmental effect         | 0.1   |

**Operational Risk Appraisal (Opra)** - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

## Section 6 – General information

### Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

### Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

### Customer charter

#### What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk). If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

#### Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.