

Compliance Assessment Report CAR_NRW0051569

Permit being assessed: BU2489IT.

For: Baglan Paper Mill, **held by:** Sofidel UK Limited

At: Brunel Way , Baglan Energy Park, Neath, Neath Port Talbot, SA11 2FP.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 21/04/2026.

Parts of permit assessed: Climate Change Risk Assessment.

NRW Lead Officer: Daren Pike.

Report sent to: Kerry Mackinnon , Environment Manager, on 21/04/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	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

Thank you for submitting your climate change risk assessment.

A desk-based light touch review has been carried out in accordance with NRW guidance. The assessment is site-specific, references appropriate current and future climate projections, considers relevant short-, medium- and long-term climate risks, and outlines appropriate risk management and monitoring arrangements.

The CCRA meets NRW's current climate change risk assessment requirements. No further action is required at this stage.

The assessment should be treated as a live document and reviewed periodically as part of the environmental management system, and following any significant climate-related events or near misses.

Light Touch Review

Climate Change Risk Assessment – Sofidel UK Baglan

Permit: EPR/BU2489IT

Site: Sofidel UK Ltd – Baglan Energy Park

Document reviewed: *Climate Change Risk Assessment*, dated 27 March 2026

Legislative / permit context: Regulation 61 notice; Permit condition 1.1.1(a)

Review type: Desk-based light touch review in accordance with NRW "Climate change risk assessment and adaptation plan compliance guide 2025–27".

1. Purpose and scope of review

This review assesses whether the submitted Climate Change Risk Assessment (CCRA) contains the minimum required components to demonstrate compliance with **general management condition 1.1.1(a)**, as set out in NRW guidance.

It is not a detailed technical audit of assumptions, modelling outputs or cost–benefit justification of adaptation measures, in line with the "light touch" intent described in Appendix 1 of the compliance guide.

2. Site specificity and contextualisation

The assessment is explicitly site-specific, describing:

- Geographic location within a coastal, low-lying industrial estate
- Nature of the pulp and paper manufacturing process, including water-intensive operations, energy dependence, and on-site infrastructure
- Ancillary systems relevant to climate exposure (e.g. wastewater treatment, cooling, energy assets)

This demonstrates an understanding of site-specific exposure pathways, rather than reliance on generic or corporate-level climate risk statements.

Officer conclusion: Meets expectations for site specificity.

3. Climate hazards and sector relevance

The assessment identifies and evaluates climate hazards that are material to the pulp and paper sector, including:

- Coastal, fluvial and surface water flooding
- Extreme precipitation and storm events
- Heatwaves and heat stress affecting plant, control systems and workforce
- Water scarcity affecting abstraction-dependent processes
- Energy system stress and grid reliability
- Supply chain disruption linked to extreme weather

These hazards align with those identified in UK Climate Change Risk Assessment (CCRA3) and sector guidance for energy- and water-intensive industries, indicating that relevant sectoral risks have been appropriately scoped.

Officer conclusion: Sector-relevant climate hazards adequately considered.

4. Time horizons and climate scenarios

The CCRA considers multiple time horizons, including:

- Near- to medium-term risk using a ~+2°C global warming planning scenario (mid-century focus)
- Long-term, high-impact risk using a +4°C warming assessment scenario to 2100

This approach exceeds a single-horizon assessment and is consistent with NRW guidance that climate risk assessments should consider **short-, medium- and long-term risks**, using current and future projections.

Officer conclusion: Time horizons and scenario framing are appropriate and proportionate.

5. Use of climate data and projections

The assessment references:

- UKCP18 probabilistic and high-resolution climate projections
- National-level UK climate risk evidence and Wales-specific summaries

- Parameters including temperature, precipitation, sea-level rise and extreme events

Use of UKCP18 demonstrates reliance on up-to-date, nationally recognised climate projections, as expected by NRW.

While assumptions are not interrogated in detail under a light touch review, the data sources cited are appropriate and credible.

Officer conclusion: Climate projections and data sources meet NRW expectations.

6. Identification and prioritisation of exposed elements

The assessment identifies a range of exposed receptors, including:

- Physical assets and infrastructure (production plant, utilities, critical services)
- Operational processes and business continuity
- Workforce health and safety
- Water and energy dependencies
- Supply chain and logistics interfaces

Risks are qualitatively prioritised using likelihood and impact matrices for each scenario, allowing identification of high and very high risks, particularly flooding-related hazards under both scenarios.

This demonstrates compliance with guidance requiring identification and prioritisation of assets, infrastructure, operations, supply chains, ecosystems and people.

Officer conclusion: Exposure and prioritisation requirements met.

7. Risk management and adaptation measures

The CCRA proposes adaptive and resilience-based measures that are:

- Clearly linked to identified high-risk hazards
- Scaled according to near-term versus long-term severity
- Framed as strategic options rather than prescriptive engineering solutions

Measures are described as being subject to corporate risk governance and review, which is appropriate at this stage and avoids pre-empting investment decisions.

Although detailed implementation plans are not expected under a light touch review, the assessment demonstrates that adaptation pathways have been identified.

Officer conclusion: Risk management measures are realistic and relevant at this stage.

8. Monitoring, KPIs and review

The document states that:

- Climate-related events will be monitored and recorded via the EMS
- The CCRA will be reviewed periodically and following significant events
- Climate risk forms part of ongoing management review cycles

While KPIs are not numerically specified, the inclusion of monitoring commitments within the EMS framework meets current minimum expectations for a light touch review, particularly given the strategic nature of the assessment.

Officer conclusion: Monitoring and review arrangements are adequate.

9. Overall compliance conclusion

Based on this desk-based light touch review, the submitted Climate Change Risk Assessment:

- Contains all key elements required by NRW guidance
- Demonstrates an understanding of site-specific and sector-specific climate risks
- Uses appropriate climate projections and scenarios
- Identifies and prioritises risks across suitable time horizons
- Integrates climate risk into the site's management system framework

Officer conclusion: There is no evidence at this stage that permit condition 1.1.1(a) is not being met.

END OF REVIEW

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.