

## Compliance Assessment Report CAR\_NRW0051592

**Permit being assessed:** CB3092CA.

**For:** MicroPharm Limited, **held by:** MicroPharm Limited

**At:** MicroPharm Limited, Cnwcau, Cilgerran, SA43 2SN.

**Type of assessment:** Report/Data Review,

**Reason:** Routine.

**On:** 22/04/2026.

**Parts of permit assessed:** CCRA Submission.

**NRW Lead Officer:** Daren Pike.

**Report sent to:** Michele Gamage, Health and Safety Officer, on 22/04/2026.

### 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

### Climate Change Risk Assessment (CCRA) – Light Touch Review

**Permit:** EPR/CB3092CA

**Site:** MicroPharm – Cilgerran, Pembrokeshire

**Assessment reviewed:** *Climate Change Risk Assessment – RA 0096 v01*

**Assessment type:** Desk-based “light touch” review

This review considers whether the submitted climate change risk assessment has the potential to meet NRW/NRA climate change risk assessment requirements, in line with the Compliance Guide and Appendix 1 checklist. It is not a detailed technical audit.

---

#### 1. Is the assessment site-specific?

**Yes**

The assessment is clearly specific to the Cilgerran site and its permitted activities. It references local geography, elevation, distance to tidal waters, site infrastructure, on-site processes and workforce arrangements. The assessment explicitly states that it applies only to this site and not other company locations.

---

#### 2. Have climate hazards and risks relevant to the sector been considered?

**Yes**

A broad range of climate-related hazards relevant to the pharmaceutical/biological manufacturing sector are identified, including severe weather, temperature extremes, power loss, flooding, transport disruption, supply chain interruption, refrigeration failure, and impacts on animal health. Consideration is given to both operational continuity and environmental protection.

---

#### 3. Have short-, medium- and long-term climate risks been included?

**Yes**

The assessment considers both current climate impacts and future risks over longer time horizons. This includes analysis of foreseeable changes associated with progressive temperature increases and changing weather patterns, allowing risks to be considered beyond the immediate term.

---

**4. Are current and future climate projections or scenarios referenced?****Yes**

The assessment references **UK Climate Projections (UKCP18)** data and includes consideration of future temperature and rainfall scenarios. Use of nationally recognised climate datasets is consistent with regulatory expectations for climate risk assessments.

---

**5. Does it describe exposed elements (assets, infrastructure, operations, supply chains, people) and prioritise them?****Yes**

The assessment identifies a range of exposed elements including buildings, utilities, equipment, storage facilities, transport routes, supply chains, staff, contractors, and business-critical systems. These risks are assessed using a structured likelihood and severity matrix, allowing prioritisation of higher-risk issues.

---

**6. Does it propose actions to manage high risks, and are these realistic and relevant?****Yes**

Where elevated risks are identified, the assessment sets out proportionate control measures and planned actions (e.g. standby power arrangements, maintenance regimes, alternative working arrangements, and further resilience measures). Actions appear realistic, site-appropriate, and aligned with existing management systems.

---

**7. Does it include key performance indicators (KPIs)?****Yes (implicit within management arrangements)**

While not presented as standalone KPIs, monitoring and management measures are embedded within existing operational controls, maintenance schedules, alarms, inspections, and review processes. This is considered acceptable at this stage for a light-touch review.

---

**8. Is there a plan to review and update the assessment?****Yes**

The assessment is identified as a live document and includes a planned review cycle, with provision for earlier review following significant events. This supports continuous improvement and integration into the site's environmental and operational management systems.

---

### **Overall conclusion**

The submitted climate change risk assessment:

- Is site-specific and relevant to the permitted activity
- Considers appropriate climate hazards using recognised climate data
- Identifies exposed elements and prioritises risks
- Proposes proportionate and realistic control measures
- Demonstrates integration with existing management systems
- Includes provision for periodic review and update

On this basis, the assessment meets current NRW/NRA CCRA requirements when subject to a light-touch review.

---

### **CAR Summary**

#### **Thank you for submitting your climate change risk assessment.**

We have carried out a basic review of your risk assessment and are satisfied it meets our current climate change risk assessment requirements.

There is no further action required at this stage. However, the CCRA is a live document and should be reviewed periodically as part of your EMS and following any significant climate change related incidents, events or near misses.

**END OF REPORT**

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](mailto: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](mailto: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.