

Compliance Assessment Report CAR_NRW0052154

Permit being assessed: AB3894ZF.

For: Unit C, **held by:** Purolite Ltd

At: Purolite International Ltd, Llantrisant Business Park, Llantrisant, Pontyclun, Rhondda Cynon Taf, CF72 8LF.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 19/06/2026.

Parts of permit assessed: CCRA.

NRW Lead Officer: Richard Taylor.

Report sent to: Sean Murphy, SHE Manager, on 23/06/2026.

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

Thank you for submitting your climate change risk assessment for Purolite Ltd which was made using the Ecolab global supply chain process safety risk matrix ref PS-ST-004. We have carried out a light-touch review of your risk assessment and are not satisfied that it meets our current climate change risk assessment requirements under Regulation 61 and permit condition 1.1.1(a).

Several gaps in the CCRA have been identified;

- There is no reference to the up-to-date climate projections (UKCP18) in the CCRA.
- There is no reference to the sector guidance sent with the Regulation 61 notice on 07/07/2025.
- There are no references to documents used to present the report.
- Short, medium and long term climate risks have not been considered. Instead the CCRA combines risks from a 2°C rise by 2050 and a 4°C rise by 2100 into the assessment.
- There are no Key Performance Indicator present (KPI's).
- The CCRA considers what elements are at risk for Operations, Logistics, Assets, and People (personnel), but does not consider disruption to supply chains, and any effect on ecosystems the site may have.
- The risk assessment matrix is company generic and only considers environmental effect in terms of the consequences of a release after the event. There is no explanation of how this metric has been chosen to represent all environmental outcomes within the CCRA.
- Release data is quantified in kg, but there is no clarification if this includes liquid effluent or releases to air where conversion factors would be expected.
- It is not clear why a release of over 500kg is the threshold between a minor and a higher action level in terms of significance.
- The Risk matrix does not allow for different scores between releases, for example a 500kg release of liquid effluent would be dealt with in the same way as a 500kg leak of epichlorohydrin by this metric. A more specific system of risk assessment should be considered for different pollutants to allow a more specific and accurate management.

Further detailed observations;

- CCRA-Column K – adaptations; the adaptations listed under this column are not all adaptations to likely climate change scenarios. Instead some simply state what the current situation is, whilst some refer to updating a separate business plan, but there is no detail what this update would be or whether the CCRA would also be updated.
- Line 10 and line 22– drought. Operations are not considered in the event of reduced flow or restrictions to the amount of towns water which is used in the process, and what impacts this may have by the 2050 and 2100 scenarios.
- Line 11, Flooding – More consideration of on-site pooling/flooding of water

should be made, ensuring water ways are clear of obstructions, such as clearing site gutters routinely could be included. Temporary closure of the site through flooding should be considered. A contingency management plan should be in place and reference within the CCRA.

- A flood risk map included as a separate tab is unlabelled. It is unclear as to its purpose in the report.

Action

The CCRA falls short of the minimum standard expected in a CCRA. The action raised is to review the current CCRA and evaluate the above findings for inclusion into the CCRA for the next review/update. There is no deadline for this, but we will be contacting all sites to adapt the CCRA into a Climate Change Adaption plan (CCAP) shortly. This carries a time limit for the next stage to occur. It would be practical to include a review of the CCRA alongside the future CCAP submission for the 2027 deadline or before.

Please note that the CCRA is a live document and should be reviewed periodically as part of your Environmental Management System (EMS) or after any significant climate-related events or near misses.
End.

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.