

The Pakistan Credit Rating Agency Limited

Rating Report

Prosperity Weaving Mills Limited

Report Contents

Rating Analysis
 Financial Information

3. Rating Scale

4. Regulatory and Supplementary Disclosure

Rating History						
Dissemination Date	Long Term Rating	Short Term Rating	Outlook	Action	Rating Watch	
23-Sep-2022	A-	A2	Stable	Maintain	-	
24-Sep-2021	A-	A2	Stable	Maintain	-	
25-Sep-2020	A-	A2	Stable	Maintain	-	
28-Sep-2019	A-	A2	Stable	Maintain	-	
30-Mar-2019	A-	A2	Stable	Maintain	-	
28-Dec-2018	A-	A2	Stable	Maintain	-	
30-Jun-2018	A-	A2	Stable	Maintain	-	
28-Dec-2017	A-	A2	Stable	Maintain	-	
15-Jun-2017	A-	A2	Negative	Maintain	-	
29-Dec-2016	A-	A2	Negative	Maintain	-	

Rating Rationale and Key Rating Drivers

Prosperity Weaving Mills Limited, incorporated in 1991, is a part of one of the oldest medium-sized textile groups in Pakistan -Nagina Group. The group has a presence in the local spinning sector through Nagina Cotton Mills Limited and Ellcot Spinning Mills Limited. The ratings reflect the improving business profile of Prosperity Weaving; characterized by increased revenue along with adequate margins. The Company is engaged in the production of greige fabric and operates with a weaving unit comprising 326 looms. In recent years, the company has replaced some of the old looms under BMR projects to improve operational efficiency. The production capacity in terms of looms has remained largely stagnant. During 9MFY22, the company's top line increased by 56% YoY to stand at PKR 8.9bln; resultant of higher capacity utilization accompanied by better prices. Prosperity Weaving caters to the need of local industry as well as export markets. Moreover, exports have increased YoY constituting 30% of total revenue (9MFY21: 25%). During 9MFY22, margins have decreased due to higher costs incurred causing a marginal decrease in net income clocking in at PKR 433mln (9MFY21: PKR 436mln). The company has a modest leveraged capital structure. The financial risk matrix of the company has shown improvement over the years. The assigned ratings derive comfort from Prosperity weaving's association with the Nagina Group. During FY22, Pakistan's textile exports surged to \$19.3bln (recording a growth of 26%). Exports grew owing to increased volumetric growth of (16% YoY) in the value-added segment, a steep rise in global demand, and record high cotton prices. Under the value-added category, the knitwear segment remained the top performer by posting 34% YoY growth in exports to \$5.1 billion in FY22 due to a sharp rise in global demand, especially in the US and European countries. Other value-added segments such as ready-made garments, bed wear, and towel posted YoY growth of 29%, 19%, and 19% to \$3.9 billion, \$3.3 billion, and \$1.1 billion respectively. However, a slowdown is expected in textile demand amid burgeoning inflationary pressures in the exporting destinations, especially in the US and European countries.

The ratings are dependent upon sustained market position of the Company. Moreover, the Company's ability to generate enough cash flows to fulfill its financial obligations is critical, along with prudent investment decisions. The equity base of the company is satisfactory and should be beefed up, going forward.

Disclosure				
Name of Rated Entity	Prosperity Weaving Mills Limited			
Type of Relationship	Solicited			
Purpose of the Rating	Entity Rating			
Applicable Criteria	Methodology Corporate Rating(Jun-22),Methodology Correlation Between Long-term & Short-term Rating Scales(Jun-22),Methodology Rating Modifiers(Jun-22)			
Related Research	Sector Study Weaving(Aug-22)			
Rating Analysts	Sehar Fatima sehar.fatima@pacra.com +92-42-35869504			



The Pakistan Credit Rating Agency Limited

Profile

Legal Structure Prosperity Weaving Mills Limited (Prosperity Weaving) was incorporated on November 20, 1991 as a public limited company.

Background Prosperity Weaving is associated with Nagina Group since its inception. The group has presence in spinning sector through Ellcot Spinning and Nagina Cotton. The Company's production facility is located in the vicinity of Sheikhupura.

Operations The Company operates with 326 Looms and has installed Benninger Zell warping and sizing machines for producing home furnishing greige fabric.

Ownership

Ownership Structure The majority stakes (~87%) of the Company is held by Nagina Group, through group companies and sponsoring individuals. The remaining shareholding rests with general public and financial institutions.

Stability The considerable positions in Nagina Group are held by Ellahi Family. The Group has a structured line of succession, reflected from equalized distribution of shareholding among Ellahi brothers and their family members. Meanwhile, third generation has already been in business, serving at various capacities.

Business Acumen Nagina Group is one of the oldest medium-sized textile houses in Pakistan. Operating under Ellahi's for five decades, developing credential expertise in spinning and weaving over the period of time. The Group has adequately expanded its operations despite competitive textile industry.

Financial Strength Nagina Group comprises three listed public limited companies, namely; i) Ellcot Spinning Mills, ii) Prosperity Weaving Mills, and iii) Nagina Cotton Mills Limited and six private limited companies. Nagina Group's private limited companies include Monell (Pvt.) Limited, Icaro (Pvt.) Limited, Haroon Omer (Pvt.) Limited, Ellahi International (Pvt.) Limited, ARH (Pvt.) Limited, and Pacific Industries (Pvt.) Limited.

Governance

Board Structure Prosperity Weaving's board comprises ten members out of which six members are non-executive directors, while one director carries the executive role and three are independent directors. Mr. Shahzada Ellahi Shaikh is the Chairman.

Members' Profile Mr. Shahzada Ellahi Shaikh – the Chairman – carries with him over two decades of experience in local textile industry. The board members have vast knowledge of textile industry; though diversity in experiences exists as well.

Board Effectiveness Three committees: Audit, Executive and Human Resource & Remuneration, are in place to assist the board in relevant matters and ensure proper oversight.

Financial Transparency M/s. Yousuf Adil, Chartered Accountants are the external auditors of the Company. They have expressed unqualified opinion on the financial statements of the Company for FY21; whereas audit of financial statements for FY22 is underway.

Management

Organizational Structure The organizational structure of the Company is divided into various functional departments, namely: (i) Marketing, (ii) Finance, (iii) Administration & HR, (iv) Accounts, and (v) Commercial (fixed asset procurement). The procurement of raw materials is handled at group-level and notable portion of yarn is sourced through group companies.

Management Team The management team is headed by the CEO Mr. Raza Ellahi who holds a graduate degree, in Economics. He is well verse with the textile business providing requisite acumen. He is supported by a team of seasoned professionals, supplementing his expertise.

Effectiveness The management meetings are held on daily basis with follow-up points to resolve or pro-actively address operational issues, if any, eventually ensuring smooth flow of operations. The Company's MIS can be classified into three categories on the basis of periodicity – Daily, Weekly and Monthly. The daily and weekly reports are generated for top management with main focus on production and liquidity position of the Company. Whereas, on monthly basis the Company's P&L is presented and discussed in the meetings. Apart from this, daily meetings (DMM) at the start of the day are held at Nagina Group's head office to make opinion on yarn and cotton prices, eventually ensuring prudent inventory procurement.

MIS Prosperity Weaving has implemented Oracle based ERP solution with five operational modules including i) Order management, ii) Procurement, iii) Inventory, iv) Fixed Assets, and v) Cash management. The Company is also equipped with 'Treasury Management System' bringing efficiency to treasury transections. This software keeps record and provides various analytical reports about the Company's exports and imports quantities, trade business to banks, outstanding forward contracts' bookings and periodic exchange rates.

Control Environment Prosperity Weaving is accredited with international certifications for compliance. The Company is following latest Quality Assurance Standards for fabric production and trade. The certification includes ISO 9001:2008, Global Organic Textile Standards and Organic Content Standard. In order to ensure better productivity and compliance with relevant certifications the plants are regularly inspected.

Business Risk

Industry Dynamics During FY22, Pakistan's textile exports surged to \$19.3bln (recording a growth of 26%). Exports grew owing to increased volumetric growth of (16% YoY) in the value-added segment, a steep rise in global demand, and record high cotton prices. Under the value-added category, the knitwear segment remained the top performer by posting 34% YoY growth in exports to \$5.1 billion in FY22 due to a sharp rise in global demand, especially in the US and European countries. Other value-added segments such as ready-made garments, bed wear, and towel posted YoY growth of 29%, 19%, and 19% to \$3.9 billion, \$3.3 billion, and \$1.1 billion respectively. However, a slowdown is expected in textile demand amid burgeoning inflationary pressures in the exporting destinations, especially in the US and European countries.

Relative Position Prosperity Weaving is associated with Nagina Group. The Group has a long history of operations in Pakistan's spinning and weaving sectors. This, strengthens the company's market position. However, on standalone basis Prosperity weaving's share in local weaving industry is minimal.

Revenues During 9MFY22, the company's revenue increased by 56% YoY to stand at PKR 8,934mln (9MFY21: PKR 4,603mln). The Company's exports share to total revenue has increased to 30% (9MFY21: ~25%).

Margins During 9MFY22, the company's gross margins decreased to stand at 11% (9MFY21: 13.7%). The operating margins recorded at also witnessed slight attrition to stand at 8.7% (9MFY21: 9.9%). Finance cost increased to stand at PKR 73mln (9MFY21: PKR 63mln). Net income recorded at 433mln (9MFY21: PKR 436mln). Subsequently, net margin decreased to 6.3% (9MFY21: 7.6%).

Sustainability The management of the company is focusing on an efficient sales mix and product differentiation strategy along with consistent monitoring of areas where measures can be taken to reduce cost and enhance the value of the company through profitably and market growth. 9MFY22 was not as profitable in comparison to the past. Hike has been witnessed in the cost structure of company. The increasing policy rates, energy prices and increase in minimum wage policy have affected the profitability of company. Moreover, the devaluation of Pak rupee has also affected the cost of raw material. The company is continuing to pursue a BMR and expansion program. 26 looms have been added to production facility. Furthermore, the company has opened LCs for import of 48 new looms along with related machinery, the expansion project will be completed by FY23.

Financial Risk

Working Capital At end-Mar22, net working capital cycle increased to 59 days (FY21: 49 days). Furthermore, room-to-borrow at the trade level significantly increased to stand at PKR 2,014mln (FY21: PKR 1,466mln) due to a significant increase in trade assets (9MFY22: PKR 2,780mln; FY21: PKR 1,686mln); culminating in lower ST trade leverage adequacy (9MFY22: 72%; FY21: 87%).

Coverages During 9MFY22, the company recorded slight attrition in free cash flows, clocking in at PKR 683mln (9MFY21: PKR 687mln). Finance cost increased to PKR 76mln (9MFY21: PKR 67mln). Interest coverage declined to 11x (9MFY21: 11.9x). Debt coverage recorded at 2.2x (9MFY21: 2.1x).

Capitalization At end-Mar22, the company's leverage inched up to 54.5% (FY21: 54.1%), remained adequately high. The total debt increased to stand at PKR 2,562mln (FY21: PKR 2,055mln); out of which, short term borrowing constituted only 33.2%. The Equity base of the company increased to stand at PKR 2,140mln (FY21: PKR 1,747mln).

Weaving



Prosperity Weaving Mills Limited	Mar-22	Jun-21	Jun-20	Jun-19
Textile Weaving	9M	12M	12M	12M
BALANCE SHEET				
1 Non-Current Assets	2,513	2,314	2,109	2,24
2 Investments	256	353	473	44
3 Related Party Exposure	-	-	-	-
4 Current Assets	2,951	1,875	1,307	1,77
a Inventories	1,462	957	519	52
b Trade Receivables	1,127	686	587	9
5 Total Assets	5,720	4,542	3,890	4,4
6 Current Liabilities	778	534	585	4
a Trade Payables	220	149	203	1
7 Borrowings	2,562	2,055	1,988	2,6
8 Related Party Exposure	-	-	-	-
9 Non-Current Liabilities	241	206	136	1
0 Net Assets	2,140	1,747	1,180	1,1
11 Shareholders' Equity	2,140	1,747	1,180	1,1
NCOME STATEMENT				
1 Sales	8,934	8,151	6,019	7,1
a Cost of Good Sold	(8,044)	(6,981)	(5,489)	(6,4
2 Gross Profit	889	1,169	530	7
a Operating Expenses	(243)	(255)	(199)	(2
3 Operating Profit	646	914	330	5
a Non Operating Income or (Expense)	(8)	(11)	37	
4 Profit or (Loss) before Interest and Tax	638	904	367	5
a Total Finance Cost	(73)	(89)	(119)	(1
b Taxation	(132)	(173)	(93)	(1
6 Net Income Or (Loss)	433	642	155	2
CASH FLOW STATEMENT				
a Free Cash Flows from Operations (FCFO)	683	1,001	469	6
b Net Cash from Operating Activities before Working Capital Changes	607	910	333	5
c Changes in Working Capital	(884)	(591)	467	(2
1 Net Cash provided by Operating Activities	(277)	319	800	2
2 Net Cash (Used in) or Available From Investing Activities	(230)	(196)	(123)	(2
3 Net Cash (Used in) of Available From Financing Activities	369	(190)	(778)	(2
4 Net Cash generated or (Used) during the period	(138)	57	(101)	(
	(150)	57	(101)	
RATIO ANALYSIS 1 Performance				
a Sales Growth (for the period)	46.1%	35.4%	-15.4%	14.5%
b Gross Profit Margin	10.0%	14.3%	8.8%	9.9%
c Net Profit Margin	4.8%	7.9%	2.6%	3.0%
d Cash Conversion Efficiency (FCFO adjusted for Working Capital/Sales)	-2.2%	5.0%	15.6%	5.5%
e Return on Equity [Net Profit Margin * Asset Turnover * (Total Assets/Shareholders' Equity)]	29.7%	43.8%	13.3%	19.5%
2 Working Capital Management	29.170	43.870	13.370	19.370
a Gross Working Capital (Average Days)	65	62	77	64
	65 50	62 54	77	
b Net Working Capital (Average Days)	59	54	67	58
c Current Ratio (Current Assets / Current Liabilities)	3.8	3.5	2.2	3.6
3 Coverages	12.0	14.7	5.0	4.2
a EBITDA / Finance Cost	12.9	14.7	5.0	4.2
	2.2	2.3	2.4	1.5
b FCFO / Finance Cost+CMLTB+Excess STB		2.2	4.5	3.3
c Debt Payback (Total Borrowings+Excess STB) / (FCFO-Finance Cost)	2.5	2.2		
c Debt Payback (Total Borrowings+Excess STB) / (FCFO-Finance Cost) 4 Capital Structure				
c Debt Payback (Total Borrowings+Excess STB) / (FCFO-Finance Cost)	2.5 54.5% 95.1	54.1% 96.4	62.7% 86.1	70.0% 91.4

Credit		opinion on credit worthiness of un				-	
	Tinancial obliga	ations. The primary factor being ca	iptured on the rating scale	is relati			
Scale		Long-term Rating Definition		Seele		m Rating	
scale		Definition		Scale			
4 AA	Highest credit quality. Lowe	st expectation of credit risk. Indica	te exceptionally strong	A1+		ity for timely repayment	
AAA	capacity for timely payment of financial commitments		A1 A strong capacity for timely repayment.				
AA+ AA	Very high credit quality. Very low expectation of credit risk. Indicate very strong capacity for timely payment of financial commitments. This capacity is not significantly vulnerable to foreseeable events.		A2 A satisfactory capacity for timely repayment. This may be susceptible to adverse changes in business, economic, or financial conditions.				
AA-				A3		tity for timely repayment	
Α	High credit quality. Low expectation of credit risk. The capacity for timely payment of financial commitments is considered strong. This capacity may, nevertheless, be vulnerable to changes in circumstances or in economic conditions.			A4	changes in business, economic, or financi The capacity for timely repayment is more susceptible to adverse changes in busines economic, or financial conditions. Liquidi		
A-					may no	t be sufficient.	
BBB BBB BBB-	Good credit quality. Currentl payment of financial comm	y a low expectation of credit risk. ' itments is considered adequate, bu omic conditions are more likely to i	t adverse changes in		A1+ AAA AA+ AA	term Rating A1 A2 A3 A	
BB+ BB	Moderate risk. Possibility of credit risk developing. There is a possibility of credit risk developing, particularly as a result of adverse economic or business changes over time; however, business or financial alternatives may be available to allow financial commitments to be met.			Long-term Rating	AA- A+ A-		
BB-				Ra	BBB+		
B +				E	BBB		
	_	margin of safety remains against of		-te	BBB-		
В	-	being met; however, capacity for c		ng	BB+		
_	contingent upon a sustai	ned, favorable business and econor	mic environment.	Γ	BB		
B-					BB-		
CCC	Very high credit risk. Sub	ostantial credit risk "CCC" Default	is a real possibility.		B +		
~~		l commitments is solely reliant upo			B		
CC	business or economic develop	pments. "CC" Rating indicates that	t default of some kind		B-		
C	appears proba	ble. "C" Ratings signal imminent d	lefault.		CCC		
С					cc		
D	Obligations are currently in default.		*The correlation shown is indicative and, in certa cases, may not hold.				
0	utlook (Stable, Positive,	Rating Watch Alerts to the	Suspension It is not	With	drawn A rating is	Harmonization	
	ative, Developing) Indicates	possibility of a rating change	possible to update an		ithdrawn on a)	change in rating due	
the potential and direction of a subsequent to, or, in opinion due to lack		termination of rating		revision in applicat			
	over the intermediate term in	anticipation of some material	of requisite		date, b) the debt	methodology or	
resp	oonse to trends in economic	identifiable event with	information. Opinion		instrument is	underlying scale	
	and/or fundamental	indeterminable rating	should be resumed in		med, c) the rating		
	ness/financial conditions. It is	implications. But it does not	foreseeable future.		ins suspended for		
	necessarily a precursor to a	mean that a rating change is	However, if this		months, d) the		
	ng change. 'Stable' outlook	inevitable. A watch should be	does not happen	-	y/issuer defaults.,		
	ans a rating is not likely to	resolved within foreseeable	within six (6)		1 e) PACRA finds		
-	e. 'Positive' means it may be	future, but may continue if underlying circumstances are	months, the rating should be considered	-	practical to surveill pinion due to lack		
	ered. Where the trends have	not settled. Rating watch may	withdrawn.		of requisite		
	licting elements, the outlook	accompany rating outlook of			information.		
	be described as 'Developing'.	the respective opinion.					

Surveillance. Surveillance on a publicly disseminated rating opinion is carried out on an ongoing basis till it is formally suspended or withdrawn. A comprehensive surveillance of rating opinion is carried out at least once every six months. However, a rating opinion may be reviewed in the intervening period if it is necessitated by any material happening.

Note. This scale is applicable to the following methodology(s): Entities

- a) Broker Entity Rating
- b) Corporate Rating
- c) Financial Institution Rating
- d) Holding Company Rating
- e) Independent Power Producer Rating

Instruments

c) Sukuk Rating

b) Debt Instrument Rating

- f) Microfinance Institution Rating
- g) Non-Banking Finance Companies
- (NBFCs) Rating

Disclaimer: PACRA has used due care in preparation of this document. Our information has been obtained from sources we consider to be reliable but its accuracy or completeness is not guaranteed. PACRA shall owe no liability whatsoever to any loss or damage caused by or resulting from any error in such information. Contents of PACRA documents may be used, with due care and in the right context, with credit to PACRA. Our reports and ratings constitute opinions, not recommendations to buy or to sell.

ACRA

112

a) Basel III Compliant Debt Instrument Rating

Rating Team Statements

(1) Rating is just an opinion about the creditworthiness of the entity and does not constitute recommendation to buy, hold or sell any security of the entity rated or to buy, hold or sell the security rated, as the case may be | Chapter III; 14-3-(x)

2) Conflict of Interest

i. The Rating Team or any of their family members have no interest in this rating | Chapter III; 12-2-(j)

ii. PACRA, the analysts involved in the rating process and members of its rating committee, and their family members, do not have any conflict of interest relating to the rating done by them | Chapter III; 12-2-(e) & (k)

iii. The analyst is not a substantial shareholder of the customer being rated by PACRA [Annexure F; d-(ii)] Explanation: for the purpose of above clause, the term "family members" shall include only those family members who are dependent on the analyst and members of the rating committee

Restrictions

(3) No director, officer or employee of PACRA communicates the information, acquired by him for use for rating purposes, to any other person except where required under law to do so. | Chapter III; 10-(5)

(4) PACRA does not disclose or discuss with outside parties or make improper use of the non-public information which has come to its knowledge during business relationship with the customer | Chapter III; 10-7-(d)

(5) PACRA does not make proposals or recommendations regarding the activities of rated entities that could impact a credit rating of entity subject to rating | Chapter III; 10-7-(k)

Conduct of Business

(6) PACRA fulfills its obligations in a fair, efficient, transparent and ethical manner and renders high standards of services in performing its functions and obligations; | Chapter III; 11-A-(a)

(7) PACRA uses due care in preparation of this Rating Report. Our information has been obtained from sources we consider to be reliable but its accuracy or completeness is not guaranteed. PACRA does not, in every instance, independently verifies or validates information received in the rating process or in preparing this Rating Report | Clause 11-(A)(p).

(8) PACRA prohibits its employees and analysts from soliciting money, gifts or favors from anyone with whom PACRA conducts business | Chapter III; 11-A-(q)

(9) PACRA ensures before commencement of the rating process that an analyst or employee has not had a recent employment or other significant business or personal relationship with the rated entity that may cause or may be perceived as causing a conflict of interest; | Chapter III; 11-A-(r) (10) PACRA maintains principal of integrity in seeking rating business | Chapter III; 11-A-(u)

(11) PACRA promptly investigates, in the event of a misconduct or a breach of the policies, procedures and controls, and takes appropriate steps to rectify any weaknesses to prevent any recurrence along with suitable punitive action against the responsible employee(s) | Chapter III; 11-B-(m)

Independence & Conflict of interest

(12) PACRA receives compensation from the entity being rated or any third party for the rating services it offers. The receipt of this compensation has no influence on PACRA's opinions or other analytical processes. In all instances, PACRA is committed to preserving the objectivity, integrity and independence of its ratings. Our relationship is governed by two distinct mandates i) rating mandate - signed with the entity being rated or issuer of the debt instrument, and fee mandate - signed with the payer, which can be different from the entity

(13) PACRA does not provide consultancy/advisory services or other services to any of its customers or to any of its customers' associated companies and associated undertakings that is being rated or has been rated by it during the preceding three years unless it has adequate mechanism in place ensuring that provision of such services does not lead to a conflict of interest situation with its rating activities; | Chapter III; 12-2-(d)

(14) PACRA discloses that no shareholder directly or indirectly holding 10% or more of the share capital of PACRA also holds directly or indirectly 10% or more of the share capital of the entity which is subject to rating or the entity which issued the instrument subject to rating by PACRA; | Reference Chapter III; 12-2-(f)

(15) PACRA ensures that the rating assigned to an entity or instrument is not be affected by the existence of a business relationship between PACRA and the entity or any other party, or the non-existence of such a relationship | Chapter III; 12-2-(i)

(16) PACRA ensures that the analysts or any of their family members shall not buy or sell or engage in any transaction in any security which falls in the analyst's area of primary analytical responsibility. This clause shall, however, not be applicable on investment in securities through collective investment schemes. | Chapter III; 12-2-(1)

(17) PACRA has established policies and procedure governing investments and trading in securities by its employees and for monitoring the same to prevent insider trading, market manipulation or any other market abuse | Chapter III; 11-B-(g)

Monitoring and review

(18) PACRA monitors all the outstanding ratings continuously and any potential change therein due to any event associated with the issuer, the security arrangement, the industry etc., is disseminated to the market, immediately and in effective manner, after appropriate consultation with the entity/issuer; | Chapter III | 18-(a)

(19) PACRA reviews all the outstanding ratings on semi-annual basis or as and when required by any creditor or upon the occurrence of such an event which requires to do so; | Chapter III | 18-(b)

(20) PACRA initiates immediate review of the outstanding rating upon becoming aware of any information that may reasonably be expected to result in downgrading of the rating; | Chapter III | 18-(c)

(21) PACRA engages with the issuer and the debt securities trustee, to remain updated on all information pertaining to the rating of the entity/instrument; | Chapter III | 18-(d)

Probability of Default

(22) PACRA's Rating Scale reflects the expectation of credit risk. The highest rating has the lowest relative likelihood of default (i.e, probability). PACRA's transition studies capture the historical performance behavior of a specific rating notch. Transition behavior of the assigned rating can be obtained from PACRA's Transition Study available at our website. (www.pacra.com). However, actual transition of rating may not follow the pattern observed in the past | Chapter III | 14-(f-VII)

Proprietary Information

(23) All information contained herein is considered proprietary by PACRA. Hence, none of the information in this document can be copied or, otherwise reproduced, stored or disseminated in whole or in part in any form or by any means whatsoever by any person without PACRA's prior written consent