

DBG-ENV36 Environmental Incident Response Procedure

1.0 Purpose and Scope

To define the actions that should be taken in the event of an environmental incident at any of the Dunbia (UK) sites to ensure a prompt response and minimised impact by:

- Outlining measures to mitigate against harmful environmental effects arising from environmental incidents such as fires, spillages, waste handling, mechanical electrical failure or storm damage.
- Outlining all the identified potential scenarios, evaluating risk associated with the scenario, detailing the likely consequences should the incident occur and listing current safeguards to prevent the incident occurring or to limit the consequence.
- Identifying responsibilities and compiling a contact list to ensure relevant authorities and/or emergency services are contacted as required.

The scope of this procedure includes all activities occurring within Dunbia (UK) site boundaries. The majority of these activities are also regulated by a Regional Environment Agency under an environmental permit. This procedure fulfils permit requirements in respect of accident management plans and emergency response procedures.

2.0 Definitions

Environmental Incident: The release, either accidental or malicious, of a harmful or potentially harmful substance or emission. Most emergencies require urgent intervention to prevent a worsening of the situation, although in some situations, mitigation may not be possible and agencies may only be able to offer palliative care for the aftermath. Eg: Chemical/oil spillage, release of substance to sewage system, or local water course. There are various classes of incidents:

- Major incident: An incident requiring the involvement of a regulatory authority due to the volume or toxicity of a harmful substance (e.g. accidental release of harmful chemical to a watercourse), which if released has the potential to leave the site boundary.
- Minor incident: An incident not requiring the involvement of a regulatory authority.

ABP: Animal By-products are biodegradable wastes consisting of animal carcasses, parts of animal carcasses, products of animal origin which are not intended for human consumption.

ELV: Emission Limit Value. These are emission limits set by a Regional Environment Agency, Local Authority or Water Service Authority.

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3.0 Responsibility

The Operations Manager is responsible for ensuring all employees and contractors are aware of their duties and the procedures to follow to prevent pollution in the event of unforeseen or environmental incident circumstances.

The Maintenance Manager is responsible for ensuring emergency situations on site do not give rise to a pollution incident with the aid of the Emergency Team and Group Environmental Department when necessary.

The Site Environmental Representative or Site Operations Manager is responsible for investigating the incident, identifying corrective and preventative actions and for notifying the Regional Environment Agency of any significant environmental incident.

4.0 Procedure

Notification:

In the event of an environmental incident the Site Emergency Team will be notified. The Site Emergency Team will be comprised of the following at minimum:

- Site Manager / Operations Manager
- Site Environmental Representative
- Health & Safety Representative Eg: Health & Safety Manager or Health & Safety Officer.
- Site Maintenance Manager

A member of the Site Emergency Team shall notify emergency response agencies if required, and the Site Environmental Representative or Site Operations Manager will notify the Group Environmental Department of any environmental incident as soon as practicable.

If required by an environmental permit, the Site Environmental Representative or Site Operations Manager will notify the Regional Environment Agency of the incident as soon as practicable, as per the Environmental & Energy Change Management & Notification Procedure (DBG-ENV12).

Each site shall maintain an Environmental and Energy Contacts List (DXX-ENVR11B) providing contact details for internal Dunbia and external contacts that may be required in the event of an environmental incident.

Any enquires in respect of an incident Eg: from media, the community shall be forwarded to the Site Operations Manager. Other employees shall not provide information to media or community regarding any environmental incident unless instructed to do so by the Site Operations Manager or a company Director.

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Risk Assessment & Control:

Risk Assessments shall be completed to identify potential hazards / scenarios for environmental incidents at each Dunbia (UK) site have been assessed and the controls reviewed. The method of assessment used was to identify the following:

- Environmental hazards;
- Potential Incident;
- Potential consequences if the incident was to occur;
- Risk Assessment; Including probability of incident occurring and severity if incident did occur. Explanation of scoring used for Probability, Severity and Risk are detailed later in this procedure.
- current safeguards in place; controls already in place to minimise impact or probability of environmental incident occurring.
- Actions planned if the environmental incident does occur; These are actions to reduce the severity of impact should an incident.

This Risk Assessment Information is recorded in the Site Environmental Incident Risk Assessment & Response Plan (DXX-ENVR36A).

Probability of each environmental incident occurring shall be determined by using a scoring system as detailed in Table 1 below:

Table 1: Probability of an event occurring:

Score	Description	Definition
1	Very Low	Extremely Unlikely To Occur
2	Low	Unlikely To Occur
3	Moderate	Could Occur
4	High	Could Occur Frequently
5	Very High	Could Occur Continuously

Severity of impact should an event occur shall be determined by using a scoring system as detailed in Table 2 below:

Table 2: Severity of impact should the event occur:

Score	Description	Definition
1	Very Low	Negligible Impact
2	Low	Minor Impact (Contained in Localised Area On Site & Recoverable)

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3	Moderate	Medium Impact (Contained Within Site Boundary & Recoverable)
4	High	Major Impact (Spread Off-site &/Or Difficult to Recover)
5	Very High	Major Impact (Spread Off-site & Long Term/Permanent Damage)

Probability (P) and Severity (S) scores assigned to each potential event shall then be multiplied together to provide a total risk assessment score (R).

Potential environmental hazards / incidents to be assessed in this risk assessment may include but shall not be limited to:

- Release of Chemical or fuel;
- Release of refrigerant;
- Release of Oils;
- Escape of gas;
- Failure of bunds;
- Fire;
- Vandalism;
- ETP Malfunction;
- Power Failure;
- Flooding;
- Escape of Waste / Animal By-Products;

After Incident:

The Site Environmental Representative shall ensure the root cause of all incidents are investigated and documented on Communication Action Form (DBG-ENVR11A) or as outlined in the Communication & Complaints Procedure (DBG-ENV11).

Information outlined in the Site Environmental Incident Risk Assessment & Response Plan (DXX/ENVR36A) shall be reviewed by the Site Environmental Representative and updated if required a least every two years at minimum, following implementation of a significant change to site activities or following an environmental incident.

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Testing / Review of Controls:

Emergency Evacuation Drills will be conducted by each site annually at minimum or as outlined in the site Fire Emergency Preparedness Plan which is managed by the Health and Safety Management System, and a log maintained.

Each Site Health & Safety Representative shall be responsible for ensuring all site firefighting equipment (Alarms, extinguishers, sprinkler systems) is serviced as required.

In addition to emergency evacuation drills once a year at minimum effectiveness of current safeguards and other controls outlined in the Site Environmental Incident Risk Assessment & Response Plan including spillage response will be tested via simulation exercises and the findings documented. Any amendments required to spillage response procedures or Site Environmental Incident Risk Assessment & Response Plans shall be completed after such an exercise.

5.0 Safety

All relevant Health and Safety Policies and Procedures must be adhered to.

6.0 Records

Preventative Maintenance Records

Site Environmental Infrastructure Checklist Records

Regional Environment Agency Notification

DBGENVR11A Communication Action Form

Evacuation Drill Log

Simulation Exercise Record

7.0 Associated Documents

DBG-ENV38 Spillage Response Procedure

DBG-ENV46 Environmental Non-Conformance Procedure

DXX-ENVR36A Site Environmental Incident Risk Assessment & Response Plan

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