

Shotton Mill Limited	Accident Management Plan	Document No:	AMP-01
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Shotton Mill Limited

Accident Management Plan

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1.0 Introduction

This Accident Management Plan (AMP) is for Shotton Mill Limited, located at the following address:

Shotton Mill Limited
 Weighbridge Road,
 Shotton,
 Deeside,
 Flintshire,
 Wales
 CH5 2LW

The site operates in accordance with Environmental Permit BT4885IT.

The installation at Shotton Mill Limited incorporates the following:

- a large-scale 750,000 tonne p.a containerboard machine
- a recycled fibre processing plant
- finished product warehouse and dispatch facilities
- a hydrogen enabled gas fired CHP
- a biomass boiler
- an anaerobic effluent treatment plant with biogas capture technology
- a 67,000 tonne p.a capacity tissue machine
- a Material Recycling Facility

This plan forms part of the Site's commitment to prevent, control, and mitigate accidents that could result in pollution, harm to human health or environmental damage.


2.0 Scope

The scope of this AMP covers all credible environmental and operational incidents associated with the installation, including but not limited to:

- An injury or medical event
- An explosion or fire
- An environmental incident including spillage / loss of containment of hazardous substance (e.g. gas, oil, chemical release)
- A significant failure of process plant
- Structural failure of buildings
- Industrial terrorism (Bomb Threat)
- Extreme weather event
- A gas leak
- A power cut
- Aircraft incidents
- Vehicle collision

This AMP applies to all site personnel, contractors, and visitors, and includes:

- **Preventative measures** to reduce the likelihood of incidents,
- **Emergency procedures** to mitigate and contain incidents if they occur,
- **Notification and reporting procedures** in accordance with permit requirements,

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- **Roles, responsibilities, and training requirements** for staff involved in incident management.

The plan is site-specific and takes account of the installation’s processes, hazardous materials, drainage systems, and sensitive environmental receptors. It is implemented alongside the Site specific operational procedures, the Site Environmental Management System and the following management plans:

- **Site Fire Prevention and Mitigation Plan (reference FPMP-01)**
- **Site Traffic Management Plan (reference TMP-01)**
- **Climate Change Management Plan (reference CCMP-01)**

Shotton Mill Limited management team ensure that that this management plan, and all associated documents, are reviewed and updated at least yearly. All Site management plans are approved by the General Manager.

3.0 Objectives

The objectives of this Accident Management Plan are to:

1. Identify credible accident scenarios and assess associated risks.
2. Define preventative measures to minimise the likelihood and severity of incidents.
3. Provide clear, practical emergency response procedures to protect personnel, the environment, and the local community.
4. Ensure compliance with NRW environmental permit requirements.
5. Maintain effective communication, notification, and record-keeping during and after incidents.
6. Provide a framework for training, testing, and continual improvement of the site’s accident management capability.

4.0 Risk Identification and Preventative Measures

The Site is certified to ISO 45001:2018 Occupational Health and Safety Standard and ISO 14001:2015 Environmental Standard and implements robust health, safety and environmental procedures to ensure the highest standards of safety and environment performance.

Procedures and safe systems of work are documented within the Site management system and reviewed regularly. Risk and method statements are in place to ensure all safety and environmental risks have been considered and acted on for all work activities.

A Risk and Opportunity review process for the Site is incorporated within the management system to ensure all safety and environmental risks are identified and assessed utilising a risk scoring system which captures the likelihood and consequence of the risk, relevant sources, pathway and receptors and key control measures associated with the risk.

Preventative measures are in place to minimise the likelihood and impact of an accident. These include, but are not limited to, the following:

4.1 Safety Incident or Fatality

Preventative Measures:

- Robust Health & Safety Management System (ISO 45001 aligned)
- Comprehensive risk assessments and safe systems of work
- Permit-to-work system (confined space, hot work, electrical isolation)
- Machine guarding and interlocked safety systems
- Lock-Out / Tag-Out (LOTO) procedures
- Regular safety training and competency assessments
- Contractor control procedures
- Behavioural safety programme
- Routine safety audits and inspections
- Clear pedestrian/vehicle segregation
- Active reporting of safety observations
- In depth investigations reports near misses and first aid incidents

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- Regular safety performance review by senior management team to monitor trends and ensure corrective actions are implemented and effective

4.2 Explosion or Fire

Preventative Measures:

- ATEX/DSEAR risk assessment in place
- Gas detection systems
- Automatic fire detection and suppression systems
- Hot work permit system
- Fire Prevention and Mitigation Plan
- Separation distances between combustible materials
- Storage management plan in place for combustible materials and hazardous waste
- Housekeeping to prevent dust accumulation
- Routine inspection of burners and fuel lines
- Fire compartmentation within buildings
- Firewater containment and drain isolation systems

4.3 Environmental Incident (Spill / Loss of Containment)

Preventative Measures:

- Robust Environmental Management System (ISO 14001 aligned)
- COSHH management procedures
- Compliance with Environmental Permit
- Bunding for tanks and chemical storage
- Segregated drainage, surface water management
- Oil interceptors with maintenance schedule
- High-level alarms on tanks
- Automatic shut-off valves
- Supervised chemical deliveries
- Spill kits located at risk points (chemical, fuel, oil storage locations)
- Spill tray kits/nappies used at risk points
- Regular inspection of pipework and transfer hoses
- Secondary containment for IBCs and drums
- ETP emergency storage capacity (Lagoon 2A has an emergency capacity of 30,000 m³)
- Compliance with CIRIA guidance (C736 Containment Systems for the Prevention of Pollution)

4.4 Significant Process Plant or Structural Failure

Preventative Measures:

- Planned Preventative Maintenance (PPM) system
- Pressure vessel inspections (written scheme of examination)
- Structural integrity inspections of buildings and supports
- Vibration monitoring and condition monitoring
- Corrosion inspection programme
- Load-bearing structure surveys
- Engineering change management procedures
- Asset integrity management system
- Competent engineering oversight

4.5 Industrial Terrorism (Bomb Threat)

Preventative Measures:

- Controlled site access and security gates
- Visitor sign-in and ID verification
- CCTV coverage
- Security patrols
- Mail screening procedures
- Staff awareness training

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- Liaison with local police
- Secure storage of hazardous materials

4.6 Extreme Weather Event

Preventative Measures:

- Implementation of climate change management plan
- Flood risk assessment conducted
- Climate resilient design standards in place (buildings, drainage design, tanks, stacks, elevated structure)
- Climate considerations incorporated within fire safety plans, for eg. increase the frequency and comprehensiveness of checks and training during times when fire risk is heightened such as heat waves/summer months.
- Monitoring procedure in place to ensure timely and accurate information about storms, heavy rainfall or heat waves.
- Action plan in place for operations at time of extreme wind speed and storm surge eg. employee communication, personal protective equipment, prepare power back ups, pumps for flood water etc.
- Implementation of additional fire prevention monitoring in extreme heat.

4.7 Gas Leak

Preventative Measures:

- Gas detection and alarm systems
- Automatic gas shut-off valves
- Routine leak detection inspections
- Pressure testing of pipework
- Gas pipework protection from vehicle impact
- ATEX compliant installations
- Competent Gas Safe registered maintenance

4.8 Redacted

[Redacted content]

4.9 Power Cut

Preventative Measures:

- Emergency backup generators
- Uninterruptible Power Supply (UPS) for critical systems
- Automatic generator start systems
- Emergency shutdown procedures
- Preventative maintenance of switchgear

4.10 Aircraft Incident

(External low-likelihood event)

Preventative Measures:

- Emergency response planning
- Structural design compliant with building regulations
- Clear access routes for emergency services
- Emergency assembly points
- Business continuity planning

4.11 Vehicle Collision

Preventative Measures:

- Traffic Management Plan

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- Segregation of pedestrians and vehicles
- Clearly marked routes
- Speed limits enforced
- Bollards protecting tanks and pipework
- Banksman during reversing
- Driver induction procedures
- Delivery supervision
- One-way traffic systems

5.0 Training

All personnel, including contractors and employees, have environmental and safety training prior to working on site. The training includes details of the Site safety and environmental standards, procedures and accident management plan, including emergency response procedures.

A fully trained Emergency Response Team is located on Site 24 hours a day, 365 days a year. The team receive specialist training to ensure a quick and effective response to accidents and incidents. They are supported by an onsite 24 hour Security team and First Aiders.

A training and competency matrix is in place for every role to ensure appropriate safety and environmental training is delivered to every employee. Annual performance appraisals identify additional training requirements and a training calendar is maintained by the training and development department to ensure refresher training is delivered, when required.

6.0 Accident and Incident Response

6.1 General Emergency Procedure (Applies to All Accidents)

Step 1 – Immediate Actions

- Stop work immediately
- Raise alarm by alerting colleagues and utilise break glass to initiate Emergency Response Team (site alarm system, location of event and alarm will be relayed to the Emergency Response Team)
- If the break-glass cannot be reached the following emergency numbers must be called:

4222 from internal phone system or 01244 284222 from an outside line or mobile phone to contact Site Security

OR

Phone the national emergency number 999


- Make area safe (if safe to do so). Only attempt to tackle incidents if competent to do so. Do not take unnecessary risks.
- Activate emergency shutdown where required
- Prevent escalation

Step 2 – Communicate

- Inform Site Manager

Step 3 – Contain

- Cordon off area and evacuate
- Isolate drainage (close shut off valves)
- Deploy spill kits / booms
- Stop pumps if necessary
- Isolate fuel or gas supply
- Shut down affected plant
- Only attempt to tackle incidents if competent to do so. Wear PPE appropriate for chemical risk. Do not take unnecessary risks.

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Step 4 – Record and Notify

- Log incident details
- Time, location, material involved
- Actions taken
- Communicate to Core Management Team, see Notification and

6.2 Evacuation Procedure

In the event of an emergency (fire) alarm being activated (**this is a continuous siren in the zone where the alarm has been activated**) **ALL** personnel must react in accordance to the Fire Orders for that Department.

1. Fire doors MUST be closed and any other doors and windows if time and conditions allow.
2. Paper Machine and other machines/equipment should be shut down in 'normal fashion' PROVIDED there is no immediate danger and it is safe to do so.
3. Supplies of gas and flammable substances should be turned off and isolated in line with gas safety procedures. Gas powered vehicles should be driven to an area external to the building where it is safe to do so and not hindering the escape of others and access for fire fighting appliances
4. Where practicable, an evacuation check of the area should be conducted by appointed fire wardens to ensure all mill personnel, contractors and visitors have been escorted to safety.
5. A roll call should be taken to include all departmental personnel and the fire warden should confirm the evacuation of the building. Reasonable enquiries are made as to any other personnel who may have been working in the area.
6. Fire water containment measures employed including shut off valves and spill barriers.
7. The Emergency Response Team meet and brief the North Wales Fire and Rescue Service upon arrival.

Unless instructed by the Emergency Response Team Leader or Fire Service, **nobody** must enter a building or leave their designated Assembly Point whilst the fire alarm is sounding.

Do not cancel the Fire alarm until requested to do so by the Emergency Team Leader.

The Shift Supervisor is responsible for allowing personnel back into the area following the all clear by the Fire & Rescue Service Leader.

Assembly points are clearly marked outside the buildings and their locations are shown on evacuation plans displayed throughout the mill.

- ERT will, if deemed able and safe to, will tackle the emergency incident
- Fire damaged materials will be assessed and separated

6.3 Industrial Terrorism (Bomb Threat) procedure


Implement Accident Emergency Response Procedure as detailed in Section 5.0

If location of bomb is known:

- Evacuate area
- Shut down plant (if safe to do so)
- Cordon off area
- Ensure roll call is taken

If location of bomb is not known:

- Initiate search
- Cordon off area(s) where suspected items are

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- **Shut down plant (if safe to do so)**
- **Evacuate suspect area(s)**
- **Ensure roll call is taken**

6.4 Accident and Incident Emergency Response Drills

Site accident and incident emergency response drills take place at least twice a year. Effectiveness of response is reviewed by site management.

7.0 Roles and Responsibilities Accident Emergency Response

7.1 Emergency Response Team Leader

Upon hearing the site fire alarm or being advised of an incident, the emergency response team leader will:

- Ascertain the location of the incident. The location of the detector or call point that has activated is displayed on the Maestro fire computer in the Utilities control room and the gatehouse. Muster at the Utilities control room or contact the Utilities control room on radio channel four or, as a last resort, by telephone, 4362.
- Go to the incident site, accept briefings, inspect, make an initial assessment to determine the nature, scale and potential. Set priorities for action, safeguarding people first and property second. Ensure the following immediate actions are carried out:
 - If the incident is major contact Security to close the gate to all vehicles other than the core management team and the emergency services.
- The emergency response team is deployed as appropriate
- The gatehouse security officers MUST be contacted to:
 - Confirm that the appropriate emergency service(s) have been called with the location
 - Provide the roll-call information if an evacuation has been started
 - Contact the gatehouse they will activate the print command. It will be printed in the gatehouse and the Utilities control room. The print-out must be shredded after use.
- Arrange for the emergency service(s) to be guided to the incident
- Arrange for the duty manager, area risk manager, core management team or any other contacts to made as appropriate.
- On the arrival of the Emergency Services (e.g. ambulance or fire and rescue service) ensure that the senior Emergency Officer attending is briefed as to the nature, scale and potential of the incident. Offer advice, assistance and provide information especially on specific risks as appropriate
- Ensure the safety of all personnel, premises and plant affected by the incident, use roll-call information and check the assembly points for any potential 'missing persons'
- Ensure effective internal and external communications. **NOTE:** Other than for illness, when **any** emergency services have attended site, the General Manager must be informed promptly. In his absence, the Engineering Manager should be contacted.
- Co-ordinate the activities of all SML and external personnel involved in or effected by the incident
- Follow the guidelines for incident management and record appropriately in the incident reporting log, Sphera Cloud

7.2 Emergency Response Team

Upon hearing the site fire alarm or learning of an incident, the emergency response team members will:

- Ascertain the location of the incident. The location of the detector or call point that has activated is displayed on the Maestro fire computer in the Utilities control room and the gatehouse. Muster at the Utilities control room or contact the Utilities control room on radio channel four or, as a last resort, contact them by telephone, 4362
- Go to the incident site take action as directed by the emergency response team leader or as appropriate should he/she not yet be there
- If evacuation process has started check with personnel at the assembly points in order to identify any potential 'missing persons'
- Perform the duties of the emergency response team leader if (s)he is not available
- Take no personal risk
- If safe, remove casualties from the danger area - refer casualties to First Aider
- Make emergency response team leader aware of any local/developing hazards and casualties

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- Be prepared to assist the emergency services as requested
- Ensure spill containment or fire water containment measures are in place and activated
- Stand down and debrief after each incident check and return equipment to correct location

7.3 Utilities Team Leader

Upon hearing the site fire alarm or being advised of an incident the panel operators will:

- Determine location of the incident from the Maestro fire alarm computer or reports
- Advise the emergency response team and the leader of the incident type and location
- Silence the alarm once feedback received from Emergency Team Leader and the alarm has sounded for at least one minute after it initiates (and re-activate it if requested by the emergency response team leader)
- Advise telephone enquirers of the location keeping calls as short as possible
- Pass on messages as directed by the emergency response team leader
- Monitor Fire Water supply systems and advise emergency response team leader of any failure
- Ensure spill containment or fire water containment measures are in place and activated
- Should sprinkler or deluge pumps start, have them checked locally
- Record events and times in the shift log

7.4 Shift Team Members

Upon hearing the site fire alarm or being advised of an incident the panel operators will:

- Take no personal risk
- Carry out emergency related or other duties as required or as directed by the emergency response team leader, shift supervisor, first aider or their deputies. Duties may include but are not limited to:
- Deploying hoses or other equipment
- Shutting down or otherwise making safe process plant or equipment
- Spill response procedures
- Water containment
- Communications
- Record keeping

7.5 First Aider Attending Scene

- Raise alarm if not already activated
- If safe to do so ascertain injured person's condition
- Attend to injured persons needs as required or as directed by emergency services or emergency team leader
- Communicate with emergency services as required

7.6 Security Officer in the Gatehouse

- Record calls associated with the incident/emergency
- Call the emergency services when asked to do so by any person, giving as much detail as is available
- Make telephone calls or perform other tasks as requested by ERT members or others
- Inform the Shift Supervisor should the emergency services be called to site
- Inform Shift Supervisor should ANY further emergency services or vehicles arrive to site


7.7 Security Officer on patrol

- Return to the gatehouse
- Guide the emergency services from the gate to the scene security vehicle will be placed in the roadway a wait for the emergency vehicle to enter site.

7.8 Area Manager

Upon hearing the site fire alarm or being advised of an incident in your area or called to an incident:

- Determine the location of the incident - if not apparent call the Utilities control room 4362.
- Seek out the emergency response team leader, be available to assist and ensure access to resources, assume duties as required
- Out of hours, the Shift Supervisor will inform the Duty Manager.

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7.9 Communications Co-ordinator (Director of Corporate Affairs)

Upon being advised of an incident the communications coordinator will:

- Check all relevant external parties have been notified e.g. NRW, HSE, National Grid etc
- Make Head Office contacts (as appropriate)
- Prepare a Holding Statement or Press Release (as appropriate)
- On rare occasions release holding statement (as agreed by the core management team)
- Brief management team on guidelines for release of information to the Media
- Monitor developments and maintain contact with the core management team to keep updated with incident status.
- Deal with wider internal communication issues.
- Monitor ongoing press/media interest/activity.
- Prepare and distribute a summary report of incident (with regard to communication issues) to appropriate parties.
- Participate in the overall process review.

8.0 Communication and Notification

The Emergency Response Team leader will ensure that, in the event of an accident or incident, the following people, or their deputies, are contacted from the Core Management Team:

- *General Manager*
- *Engineering Manager*
- *Environmental Manager*
- *Health and Safety Manager*
- *Director of Corporate Affairs (Communications)*
- *Area Manager (if out of hours, Friday 4.30pm – 8:00a.m. Monday, Duty Manager and Duty Engineer to be contacted)*

The Director of Corporate Affairs is to ensure that the relevant authorities and regulators have been notified as required (including, but not limited to, Natural Resources Wales, Health and Safety Executive, National Grid, Local Authority and Police). Responsibility for notification of incidents to authorities and regulators is as follows:

- *Environmental Incident - Environmental Manager*
- *Health and Safety Incident – Health and Safety Manager*