



# Control of Major Accident Hazards Regulations 2015 (Seveso 3) (COMAH)

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## External Plan

Issue 1.3 (March 2021)

Classification: Public

**Britannia Refined Metals Ltd**  
Botany Rd,  
Northfleet,  
Gravesend,  
Kent DA11 9BG

**Next Scheduled Review: March 2024**

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*KCC Resilience and Emergency Planning Service is accredited under ISO14001 (Environmental Management)*

## Distribution

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<b>Britannia Refined Metals Ltd</b>
<b>Health &amp; Safety Executive (HSE)</b>
<b>Environment Agency (EA)</b>
<b>Kent Fire &amp; Rescue Service (KFRS)</b>
<b>Kent Police</b>
<b>South East Coast Ambulance Service (SECAMB)</b>
<b>Maritime &amp; Coastguard Agency (MCA)</b>
<b>Marine Management Organisation (MMO)</b>
<b>NHS South East and CCG</b>
<b>Public Health England (PHE) - Kent Health Protection Team (South East) (HPT)</b>
<b>Port of London Authority (PLA)</b>
<b>Kent County Council (KCC)</b>
<b>Gravesham Borough Council (GBC)</b>
<b>Dartford Borough Council (DBC)</b>
<b>Medway Council</b>
<b>Thurrock Council</b>
<b>Kent Resilience Team (KRT)</b>
<b>Department for Environment, Food &amp; Rural Affairs (Defra)</b>
<b>Food Standards Agency (FSA)</b>
<b>Natural England (NE)</b>
<b>Met Office</b>
<b>Ministry of Housing, Communities and Local Government (MHCLG)</b>
<b>Southern Water</b>
<b>Thames Water</b>

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## Section 1 - Purpose and Activation

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### 1.1 Purpose

This External Plan has been prepared to describe:

1. The method by which the response to a major accident is implemented;
2. How an emergency response will minimise any effects upon and/or damage to human health and welfare, the environment, property and infrastructure;
3. How measures necessary to protect the environment from the effects of major accidents will be implemented;
4. How information will be communicated to the public, the emergency services, local authorities and other stakeholders;
5. How the environmental restoration and clean-up following a major accident will be achieved;
6. The agreed roles and responsibilities of response organisations;
7. The management and integration of the emergency response; and
8. How the requirements and objectives of the COMAH Regulations 2015 are met.

The External Plan is supported by detailed emergency/contingency plans and/or operating instructions for each of the response agencies.

It also integrates with the Onsite Plan and uses information supplied by Britannia Refined Metals Ltd and contained within the Site Safety Report approved by the Competent Authority and Onsite Plan.

It is important to note that the HSE has determined that this External Plan should be prepared in respect of potential adverse environmental impacts upon the adjacent tidal River Thames and surrounding areas (including Botany Marsh). This is further explained in Section 3 of this plan.

### 1.2 Definition of a Major Accident

The Control of major Accident Hazards Regulations 2015, defines a Major Accident as: -

*“An occurrence such as a major emission, fire, or explosion resulting from uncontrolled developments in the course of the operation of any establishment to which these Regulations apply, and leading to serious danger to human health or the environment (whether immediate or delayed) inside or outside the establishment, and involving one or more dangerous substances”.*

### 1.3 Onsite Major Accident Declaration - Criteria

A major accident will be declared when the control measures, which have been implemented as a result of procedural, Hazard Identification (HAZID) or general assessments, are proven to be inadequate. The onsite emergency procedures have been developed to ensure that appropriate decisions can be taken to escalate any incident from a minor controllable incident to a Major Accident.

## 1.4 Quick guide to COMAH emergency

1. Start a log book;
    - Record the time of each entry;
    - Log all alerts and any resulting actions;
    - Capture the rationale for each of your actions;
  2. Inform relevant organisations and parties using contact flowchart on page-39;
  3. If the County Emergency Centre at Invicta House is mobilised it may be appropriate to work from this location;
  4. You may be required to attend or dial-in to a multi-agency Strategic or Recovery Co-ordinating group meeting at Police Headquarters, Maidstone
  5. If the incident is such that a more collective corporate response is required, a meeting of the Corporate Management Team will need to be facilitated.
- 
6. What happens next (key steps):
    - The police, and other organisations, will continue the call-out process;
    - The police will set up the SCC;
    - The operator will initiate PETIS to warn and inform those in the DEPZ and advice shelter and PITS;
    - The SCG and STAC will set up and take over strategy coordination of the incident and the generation of public advice;
    - The police, local authority, operator and health authorities will work together to protect, advice and reassure the public;
    - When the situation allows and the key stakeholders agree, there will be a transition, either to normality or to a recovery process.

## **1.5 Responsibility for Onsite Declaration of a Major Accident**

The decision as to whether any incident is major, or minor is determined by Britannia Refined Metals Ltd.

## **1.6 Types of Foreseeable Incidents**

Whilst the COMAH Safety Report clearly demonstrates that the likelihood of a fatality or serious disabling injury resulting from a Major Accident Hazard (MAH) is very low, it is recognised that they could occur. The major risks to the site are:

1. Flooding due to a breach of the tidal River Thames flood defences during a high tide releasing wastes containing lead oxide (PbO) to the river and / or Botany Marsh.
2. Flooding due to the overtopping of the tidal River Thames flood defences during a high tide releasing wastes containing lead oxide (PbO) to the river and / or Botany Marsh.
3. Flooding due to a flood-gate being left open or damaged on an adjacent site during a high tide releasing wastes containing lead oxide (PbO) to the Botany Marsh.
4. A release of waste containing lead oxide (PbO) with contaminated firefighting water to the tidal River Thames and or Botany Marsh.
5. A release of waste containing lead oxide (PbO) as a result of flooding caused by surface water or culvert back-flow on a high tide to the tidal River Thames.

## **Events which could cause a Major Accident or a Major Accident to the Environment**

1. A release of toxic cadmium (Cd) / cadmium oxide (CdO) fumes into the Isa refinery building due to a loss of extraction.
2. Release of toxic sulphur dioxide (SO<sub>2</sub>) gas due to a sulphur fire or loss of extraction in either the Isa refinery or the S kettle refinery.

## **1.7 When this External Plan will be Activated**

This plan will be activated when:

9. A major accident occurs (or may potentially occur); or
10. An uncontrolled event occurs which could be reasonably expected to lead to a major accident.

## **1.8 Responsibility for Activating the External Plan**

The Britannia Refined Metals Ltd main site controller or deputy are responsible for activating the External Emergency Plan.

In certain circumstances the External Plan would be activated by the Kent County Council Duty Emergency Planning Officer (See Section 1.9 below).

## **1.9 How the External Plan will be Activated**

Britannia Refined Metals Ltd personnel will make a '999' telephone call to the emergency services whenever a major accident has occurred, or an uncontrolled event has taken place which could reasonably be expected to lead to a major accident.

A '999' telephone will be made requesting attendance by:

1. Kent Fire and Rescue Service
2. Kent Police

If there are casualties a request should also be made for attendance by South East Coast Ambulance Service.

Britannia Refined Metals Ltd shall provide a situation report addressing onsite impacts for emergency responders.

1. Kent County Council Duty Emergency Planning Officer
2. The following information will be given to each emergency service (and other responders in due course):
  1. Britannia Refined Metals Ltd, Northfleet, Gravesend, Kent DA11 9BG
  2. It is an upper-tier COMAH site and are activating the external COMAH Plan
  3. Details of the incident or potential incident (using the METHANE mnemonic)
  4. Casualties
  5. Actual or potential hazards for responding services
  6. Access point for emergency services' vehicles
  7. Location of onsite Rendezvous Point (RVP)
  8. That it has or may impact adversely on the environment
  9. Any other relevant information
  10. Contact telephone number(s)

Generic emergency planning procedures require Kent Police to alert (and liaise) with Kent County Council Duty Emergency Planning Officer on a Major Accident being declared. This protocol ensures a “double-lock” on alerting i.e.

1. The Kent County Council Duty Emergency Planning Officer, on receiving an alert to a (potential) major accident establishes that the External Plan has not been activated by the Company, he/she, as the appropriate local authority representative will, as required by the COMAH Regulations 2015, activate this external plan, ensuring that all emergency services and other responders are aware, and that appropriate attendance and response is triggered.
2. Any of the emergency services attending a (potential) Major Accident establishes that the External Plan has not been activated then they should inform the Kent County Council Duty Emergency Planning Officer who will ensure that action outlined above at number 1. is taken.

## **1.10 Reviewing and Exercising**

This plan will be reviewed and where necessary revised at suitable intervals not exceeding three years. Reviews of this plan will consider changes occurring at the Britannia Refined Metals Ltd site, and in relation to the emergency services and other organisations, legislation, emergency planning philosophy, experience and lessons learned from operational response and through exercising and testing this and other relevant plans.

This plan will be tested by either live deployment on site, table-top and/or alerting exercises once every three years. Exercises will involve the site operator, Kent County Council, the emergency services and other appropriate stakeholders.

## Section 2 - Outline Responsibilities

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### 2.1 Britannia Refined Metals Ltd

#### a) Initial Actions

1. Ensure the safety of personnel;
2. Ensure that the onsite plan has been activated;
3. Employees, contractors and visitors must evacuate the area and proceed to the main assembly point if there is a continuous sounding alarm.
4. Alert the emergency services;
5. Alert KCC Duty Emergency Planning Officer (DEPO);
6. Advise the emergency services that they are triggering the External Plan;
7. Ensure environmental protection measures are implemented;
8. Ensure that an onsite (RVP) is identified and communicated to the emergency services for initial attendance;
9. Ensure that a company representative attends the RVP to assist incoming emergency services;
10. Advise adjacent premises;
11. Arrange for a chronological log to be kept of all significant actions taken;
12. If appropriate, provide technical advice on the plant and its processes to the emergency services;
13. Assist with the communications strategy and dissemination of Public Information;
14. Advise the emergency services of any need to transmit safety warnings to persons in the surrounding area.

#### b) Further Key Actions

1. Provide media and public information on hazards and any countermeasures;
2. Notify the Health and Safety Executive (HSE) and Environment Agency (EA);
3. Gather and preserve evidence in anticipation of an investigation (N.B. If death or serious injury has occurred and /or there has been sabotage the police will treat this as a crime scene, as they will need to gather evidence);
4. Inform relatives in liaison with Kent Police regarding any major accident to employees;
5. Enter the details of the emergency on all relevant accident notification forms; and
6. Arrange for liaison/representation at strategic and/or recovery co-ordinating groups, if necessary.

### 2.2 Kent Fire and Rescue Service

1. Protecting life and property in the event of fire;
2. Rescuing people from collapsed buildings/structures;
3. Lifesaving through search and rescue;
4. Securing adequate supply of water for fire-fighting;
5. Removing chemical contaminants from people and containing run off;
6. Detection, identification and monitoring of hazardous materials;

7. Management of hazardous materials and protecting the environment at incidents;
8. Salvage and damage control at fire incidents;
9. Safety management within the inner cordon for KFRS led incidents; and
10. Establish liaison with Britannia Refined Metals Ltd, Police, Ambulance, KCC DEPO, Port of London Authority and the Environment Agency at the onsite and/or offsite emergency control centre(s).

## 2.3 Kent Police

The primary areas of Kent Police responsibility are:

1. Preserving life in conjunction with other emergency services;
2. Protecting property and environment;
3. Co-ordinating the activities of the emergency services and other responding agencies at and around the scene of a land based sudden impact emergency or major incident;
4. Ascertain whether any external ground or water pollution has occurred or is likely;
5. If so, ascertain whether this External Plan has been activated by the Company and if not notify KCC DEPO;
6. Carry out a dynamic risk assessment as necessary;
7. Establish communication with site and other responders;
8. Identify, through liaison with the Environment Agency and Kent Fire Rescue Service, safe approach routes to the site if necessary;
9. Deploy staff to the 'Onsite RVP';
10. Deploy an Officer to the onsite emergency control centre;
11. Set up an external tactical (silver) control if required;
12. Designate and maintain any cordons required. In respect of an inner cordon during the rescue phase, this responsibility must be undertaken in conjunction with Kent Fire and Rescue Service;
13. Implement traffic management arrangements if required;
14. Assist with the communications strategy and dissemination of Public Information; (refer to comments re. role of Kent Fire and Rescue Service above.
15. With relevant agencies and the operator consider any need for evacuation;
16. Inform KCC DEPO;
17. Consider the need for a Local Authority Incident Liaison Officer (LA ILO) at tactical (silver) control and/or operational (bronze) control;
18. Consider the need to collate casualty information;
19. Support the role of HM Coroner in the investigation of the cause and circumstances of unexplained or sudden deaths. This duty extends to the retrieval of the deceased, their personal property, the positive identification of the deceased and their return to their family or friends for burial or cremation;
20. Protecting and preserving the scene, so as to safeguard and collect evidence for subsequent inquiries and possibly, criminal proceedings (see above re. Britannia Refined Metals Ltd collecting evidence);
21. Investigate any potential breaches of criminal law in conjunction with other investigative bodies or competent authorities; and
22. If terrorism is suspected to be the cause of an emergency, assume overall control of the incident.

## **2.4 South East Coast Ambulance Service**

1. Consider the requirement to declare an external emergency;
2. Consider implementation of the Major Incident Plan;
3. Obtain details of the incident from the site operator;
4. Inform the Clinical Commissioning Group (CCG) and Public Health England (PHE) if required;
5. Identify safe approach route after a dynamic risk assessment;
6. Direct Ambulance crews to the onsite Rendezvous Point;
7. Deploy an Ambulance Manager/Officer to tactical (silver) control and/or operational (bronze) control;
8. Establish communications with other responding agencies;
9. In consultation with Police identify locations for Incident Command Vehicle and external RVP responding ambulances including marshalling area should that be necessary;
10. Ascertain product/chemical involved;
11. Establish appropriate level of protection for staff;
12. Determine availability of onsite facilities for
13. Casualty management,
14. Decontamination;
15. Provide decontamination facilities (with Fire Service assistance if necessary); and
16. Identify and inform receiving hospital(s).

## **2.5 Kent County Council Duty Emergency Planning Officer**

1. Receive alerting calls from Britannia Refined Metals Ltd, Kent Police and/or Kent Fire & Rescue Service;
2. Commence an incident log;
3. Ascertain details of the incident;
4. Confirm that Britannia Refined Metals Ltd has activated the COMAH External Emergency Plan;
5. If Britannia Refined Metals Ltd have not done so, activate it immediately;
6. Alert the emergency services and advise them that KCC are activating the External Emergency Plan;
7. Inform Gravesham and Dartford Borough Councils that this plan has been activated;
8. Advise and alert relevant KCC services and other agencies depending on the circumstances and (potential) effects of the incident in accordance with normal practice;
9. Liaise with KCC Highways, Transportation and Waste in relation to transportation implications, drainage infrastructure, waste disposal and equipment requirements;
10. Liaise with Environment Agency and Natural England in relation to mitigation and monitoring of harm to the natural environment;
11. Assist with the communications strategy and dissemination of public Information;
12. Alert Government Decontamination Service;
13. Co-ordinate voluntary sector if required

N.B. It is essential that the Environment Agency, as lead agency for aquatic pollution, are alerted given that this is the most likely consequence of a release of contaminants to the environment.

## 2.6 Gravesham and Dartford Borough Councils

1. Receive the alerting call;
2. Send a Local Authority Incident Liaison Officer (ILO) to Britannia Refined Metals Ltd premises to ascertain the extent of the incident and any actual or potential impact on the local community;
3. Consider the requirement to declare an emergency in respect of the Borough Council's response;
4. Maintain an incident log;
5. If appropriate activate the Borough Council's emergency arrangements
6. Alert the Environmental Health Officer;
7. Assist with the communications strategy and dissemination of public information;
8. Send a Local Authority Incident Liaison Officer to the Tactical Co-ordinating Group or Britannia Refined Metals Ltd onsite emergency centre if necessary;
9. Ascertain actions required of the Borough Council;
10. Consider the (potential) future effects on the community and environment.
11. Determine, in consultation with KCC and the Environment Agency, the appropriate lead agency for recovery co-ordination. Refer to the community recovery considerations in Section 8 of this plan and the KRF Pan Kent Recovery Framework;
12. Set up and manage rest centres if required; and
13. Assist with dissemination of public information and media matters.

## 2.7 Environment Agency (EA)

The Agency has responsibility throughout England and Wales for:

1. The management and regulation of the water environment, including abstraction licensing, pollution control, flood warning and flood defence;
2. Controlling industrial pollution, particularly at nuclear, oil and chemical sites and major industrial processes; and
3. Regulating the transport and disposal of wastes.

### Incident Response

1. The Agency will attend all incidents posing a significant or potentially significant environmental impact, or, in specific circumstances, posing a threat to human health;
2. Receive alerting call to a (potential) major accident having external environmental consequences;
3. Assist in identifying the (potential) environmental impact;
4. Advise on mitigation measures with the emergency services and/or the site operator to minimise environmental impacts;
5. (in liaison and consultation with the Company, warn water abstractors and water users who may be at risk;
6. Notify other organisations that might be affected (e.g. Food Standards Agency, Natural England, Water Companies);
7. The Agency will work with Kent Fire Service and KCC Highways Transportation and Waste to minimise the threat to the environment caused by chemical spills and contaminated fire-water run-off and warn appropriate parties who may be affected by the associated dangers;
8. According to the seriousness of the incident, an Agency officer will attend as soon as possible following receipt of a report within a maximum of two hours during normal office hours and

within four hours outside office hours. However, these are maximum times and every effort will be made to attend as quickly as possible;

9. Ascertain the extent and source of pollution where required and collect samples and other evidence in relation to offences under environmental legislation;
10. Assist with the communications strategy and dissemination of Public Information;
11. Provide liaison officers to Operational, Tactical and Strategic Co-ordinating Groups; and
12. In the event of a major air quality incident, co-ordinate the provision of air quality data which can be used for the basis of public health advice through co-ordination of a multi-agency Air Quality Cell. The cell will brief tactical and strategic command groups through the local Health Protection Liaison Officer.

## 2.8 Water Companies

	<b>Southern Water</b>	<b>Thames Water</b>
1. To receive initial information of incident.	√	√
2. Provide expertise, as required, to support emergency response and recovery	√	√
3. Provide Liaison Officer at onsite emergency centre if requested	√	√
4. Provide Liaison Officer at Local Authority Emergency Centre(s) if requested	√	√
5. Despatch Trade Effluent Officer to the incident if necessary		√
6. Implement measures to protect water supplies	√	
7. Implement measures to protect drainage system and Waste Water Treatment Works		√
8. Provide emergency water supplies if necessary	√	
9. Consider need to formulate advice on contaminated water supplies	√	
10. Liaise with and advise Britannia Refined Metals Ltd on relevant drainage issues.		√
11. Liaise with Environment Agency	√	√
12. Consider need to advise the public regarding contaminated drainage supplies		√
13. Liaise with emergency services regarding public warning.	√	√
14. Assist with local dissemination of information if required	√	√
15. Maintain logs and records of all activities	√	√
16. If requested appoint a representative to the multi-agency Strategic Recovery Co-ordinating Group	√	√

## **2.9 Public Health England (PHE) Kent Health Protection Team (South East)**

The PHE Kent Health Protection Team (South East) will be supported, if required, by the Chemical Hazards and Poisons Division (CHAPD) of the Health Protection Team (HPT) and work closely with the NHS and other agencies in responding to incidents:

1. Receive an incident alert from South East Coast Ambulance Trust;
2. Provide any necessary expert advice to the Tactical Co-ordinating Group in respect of health aspects of the incident;
3. If required, convene the Science and Technical Advice Cell (STAC) to be chaired by the Director of Public Health (DPH) or Consultant in Communicable Diseases (CCDC);
4. Supported by CHAPD, provide health advice to the public and other agencies, e.g. about the toxic effects of released chemicals and actions to be taken to protect health;
5. In collaboration with the DPH, provide health-related information to GPs, hospital staff and NHS staff during the incident;
6. Provide health advice to partner agencies as required, including advice on decontamination;
7. Assist with the dissemination of Public Information;
8. In collaboration with the DPH, advise Police Commanders on the health considerations of a decision, e.g. evacuation versus sheltering decision (through STAC or otherwise);
9. Prepare health protection components of agreed media statements. Liaise with police and the DPH on this; and
10. Liaise with other agencies to ensure an appropriate response in the recovery phase, continuing to access and provide expert health advice.

## **2.10 NHS Kent & Medway**

NHS Kent & Medway is responsible for co-ordinating the overall health response to a Major Incident, with South East Coast Ambulance Service Trust (SECAmb) providing the blue light response for the NHS. NHS Kent and Medway will work closely with Public Health England (PHE) who will provide the expert health protection advice.

NHS Kent and Medway will:

1. Receive alert from Emergency Services and/or KCC Emergency Planning
2. Coordinate the health response to the incident
3. Provide input at any Strategic Co-ordination Group meetings;
4. If required, convene the Scientific and Technical Advice Cell (STAC), to be chaired by the Director of Public Health (DPH) or Consultant in Communicable Diseases (CCDC);
5. Supported by the PHE, advise Police Commanders on the health considerations of decisions, e.g. evacuation versus sheltering (through the Scientific and Technical Advice Cell (STAC) or otherwise);
6. Assist the Health Protection Team (HPT) to assess any potential risk to the population;
7. Cascade information (including that provided by PHE) to GPs and responding NHS Staff;

8. Ensure the provision of health care in rest/reception centres (if required);
9. Provide replacement medication to the public (if required);
10. Assist with the dissemination of public information;
11. Liaise with PHE over health aspects of agreed media statements/interviews. (Police lead on this initially); and
12. Liaise with other agencies to ensure an appropriate response in the recovery phase.

## Section 3 – Site information

### 3.1 The Company

Britannia Refined Metals Ltd refines lead bullion and produces high quality 99.99 pure lead, bespoke lead alloys and silver.

The site, under the name of Britannia Refined Metals Ltd, employs 160 people and is part of the Zinc division of Glencore. The principal manufacturing units are the Isa Refinery and the Silver Plant. The site is equipped with its own analytical laboratories, workshops, administrative offices, stores and engineering departments. Britannia Refined Metals Ltd is a Top Tier Control of Major Accident Hazards (COMAH) site due to its production and handling of inhouse waste products containing various levels of lead oxide (PbO), which is deemed to be acutely and chronically toxic to aquatic life.

### 3.2 Site Location

The Britannia Refined Metals Ltd plant is located at Botany Rd (off Manor Way), Northfleet, Gravesend DA11 9BG, on the western edge of Gravesham Borough close to the administrative boundary of Dartford Borough (Grid Ref. TQ 61358 75275).

The plant is bounded to the north by the tidal River Thames and to the south by the fresh water Botany Marsh, and is located close to other commercial sites fronting the river. The Ebbsfleet United football stadium is located a short distance southeast of the plant. The nearest residential areas can be found south of the A226 and east of Grove Road.

Aerial photograph of Britannia Refined Metals Ltd and surrounding area



### 3.3 Local Environmental Information

The site is located immediately adjacent to the tidal River Thames and the fresh water Botany Marsh.

The river frontage is characterised by hard engineered defences and intertidal mud flats.

Botany Marsh comprises a network of drainage ditches, ponds, former grazing marsh, rough grassland and scrub. The ditches and ponds on the site are dominated by taller emergents such as common reed (*Phragmites australis*) and great reedmace (*Typha latifolia*).

Rotational ditch clearance interventions are undertaken on the site creating some areas of open water.

There are no statutory protected site designations within the immediate surrounding area of the plant.

Botany Marsh, a recently cleared length of drainage ditch with stand of common reed in foreground



## **Section 5 – Public Information**

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### **5.1 Public Information Zone (PIZ)**

The competent authority has determined that as the potential consequences of a major accident are environmental only, COMAH Regulation 18(294) which states: “The PIZ does not cover areas where a major accident might cause solely environmental damage” is not applicable and has therefore set a Consultation Distance of zero.

As the Consultation Distance equates to the Public Information Zone there is no requirement to provide public information as required by Regulation 17(1 & 2) including to adjoining commercial premises.

However, during any incident, (e.g. where emissions occur) should it be considered necessary or advisable to alert, inform or advise the public, local community or adjoining premises for any reason, the KRF Public Warning and Informing Strategy will be implemented.

This plan will be made publicly available via the KCC web-site and, as with any other incident, should public information, reassurance or advice be required at any time, this will be provided. The consultation strategy for this external plan also encompasses local elected representatives and neighbouring businesses.

### **5.2 How the Public will be Notified and Kept Informed during an Incident**

In the event of a Major Accident being declared, and thus triggering the external COMAH plan, Kent Fire and Rescue Service will assume the lead on communications strategy and dissemination of Public Information, in liaison with the Company and other key partners. This follows the established and agreed principles contained within the Kent Resilience Forum Public Warning and Informing Strategy.

### **5.3 Public Advice in the Event of River Pollution**

In the event of an external major accident actual or suspected pollution of the tidal River Thames, smaller local water courses and/or drainage and sewerage systems, advice to the public will be formulated jointly as necessary by the responding agencies.

Any such advice will be promulgated through the practices and procedures previously agreed by partners in the Kent Resilience Forum ‘Public Warning and Informing Strategy’ (see also Section 5 of this plan).

The Company, Port of London Authority and Environment Agency hold contact details for river users and will utilise those contacts to disseminate relevant information as required.

## 5.4 How the Public will be Notified of the Conclusion of an Incident

The method(s) of notification will be dependent on the nature and extent of the incident but will include media releases and contact with adjoining businesses, river users and local communities.

It will be consistent with the section of the KRF Public Warning and Informing Strategy entitled 'Communication in the Recovery Phase'.

Notwithstanding that the external consequences of the incident are concluded consideration to any continuing need to provide further public information.

## Section 6 – Media Strategy and Information

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### 6.1 General

The KRF Media and Communications Strategy states:

*The KRF will "Provide accurate, authoritative and timely information, so that the public is well-informed and better able to respond to an emergency and, thereby, minimise the impact on themselves and the wider community".*

### 6.2 Initial Response and Strategy

In the initial response a joint multi-agency (including Britannia Refined Metals Ltd) media response will be led by the agency or agencies co-ordinating the incident in its early stages.

The Britannia Refined Metals Ltd communications lead will liaise with the response and recovery organisations media officer(s) to ensure a co-ordinated approach to media liaison.

Providing relevant and timely information about the nature of the unfolding event, including:

1. Immediate actions being taken by responders to minimise the risk to human or animal health and welfare, the environment or property;
2. Actions being taken by responders to assist the recovery phase;
3. Actions the public can take to minimise the impact of the emergency if effected;
4. How further information can be obtained; and
5. End of emergency, recovery and return to normal arrangements

### 6.3 Lead Organisation

The lead agency for the incident will be determined by the nature and scale of the event and will be agreed by agencies as soon as practicable. Kent Police will be the default lead agency, until other arrangements are agreed.

## **Response phase**

The lead agency will be responsible for maintaining procedures and a capability for:

1. Contacting other relevant responder organisations and informing them of action being undertaken or proposed;
2. Delivering urgent emergency warnings, or ensuring they are delivered;
3. Co-ordinating all communications activity at the time of an emergency, so that Public information is consistent, timely and without unnecessary duplication;
4. Delivering information and advice in relation to its functional areas of responsibility;
5. Assisting other participating responder organisations to deliver information and provide advice in relation to their functional responsibilities.
6. Provision of and organisation of a media and communications response capability; an agreed lead spokesperson to work with the media and facilities for staff from different responder organisations to work together on a public information service. It is possible that these facilities will be provided through virtual meetings.

## **Recovery Phase**

In the recovery phase the County or Borough Council(s) (depending on the scale of the incident) and the Environment Agency will be closely involved in all media matters.

## **6.4 Britannia Refined Metals Ltd Media Management**

1. The Britannia Refined Metals Ltd media manager will liaise with their commercial partner Glencore and will provide the media link to responding agencies.
2. Factual details relating to an incident.
3. Factual details relating to the company response.

## Section 7 – Recovery

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The following outlines in principle the generic arrangements for recovery as agreed by the Kent Category 1 and 2 Responders in the Pan Kent Emergency Recovery Framework.

If a Strategic Recovery Co-ordinating Group is set up following an incident at Britannia Refined Metals Ltd it will work to those principles. However, it is acknowledged that any potential incident for which this external plan is constructed is not expected to impact adversely on the persons beyond the site boundary, but is more likely to have an environmental impact primarily as a result of hazardous substances entering the adjacent tidal River Thames and Botany Marsh.

However, the general principles, as would be applied to such an incident are outlined below.

### Multi-agency Recovery

In accordance with the Kent Resilience Forum Pan Kent Emergency Recovery Framework, the multi-agency response to the recovery phase of an emergency, as applied to a relevant incident at Britannia Refined Metals Ltd. will usually be led by either the County or Borough Council(s), depending on the scale and effect of the incident, i.e. should it be of a greater magnitude than is reasonably foreseeable and wider co-ordination of the recovery is necessary.

As the majority of impacts would almost certainly be environmental the Environment Agency would play a significant role in advising and guiding the recovery process.

The arrangements to be implemented for recovery and the relevant lead responder will be agreed prior to the hand-over from the response to the recovery phase of an incident.

The lead organisation will chair any Strategic Recovery Co-ordinating Group (should that be necessary) ensuring appropriate engagement by all relevant agencies and organisations including Britannia Refined Metals Ltd.

The recovery process will usually involve one or more specialised sub-groups, namely:

1. Health and Welfare;
2. Community Recovery;
3. Communications;
4. Environment and Infrastructure;
5. Finance and Legal; and
6. Business and Economic.

In the case of the Britannia Refined Metals Ltd site, this is likely to be an Environment and Infrastructure sub-group.

## **Section 8 – Environmental Protection**

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### **8.1 Site Actions for the Management of Environmental Clean-up and Restoration**

Britannia Refined Metals Ltd recognises the importance of having suitable and sufficient procedures in place to ensure that the consequential damage from any major accident is controlled. The types of potential major accident have been identified and the consequences determined in general as having the potential to affect the ground, air or adjacent water courses.

Ground contamination can occur as a result of flooding, fire through fire water runoff, or spillages from static or mobile vessels or containers. A number of the materials held onsite have the potential to cause damage to the environment.

Contamination of drains and watercourses, namely the adjacent tidal River Thames, the onsite surface water drainage system, and water courses and bodies within the adjacent Botany Marsh.

Contamination of air and the environment from fire and release of toxic SO<sub>2</sub> gas due to a Sulphur fire or loss of extraction in either the Isa refinery or the S kettle refinery.

### **8.2 Post Incident Clean Up Procedures**

#### **Onsite Equipment**

The consequences of any incident are likely to require the use of external companies or specialist contractors. However, the following non-exhaustive list of items are held on-site;

Generators, pumps, mobile lighting units, hand tools (for example spades, shovels, etc), mobile ventilation/extract equipment and spillage kits. Various containers for waste including intermediate bulk containers (plastic or steel), clip top drums, 200l steel drums, plastic bags, etc are also available on the site.

### **8.3 Contractors and External Specialists**

The Site Operator has formal agreements with contractors who can provide a 24hr response with expertise and equipment necessary to supplement the site response arrangements.

### **8.4 Chemical Safety Data Information**

Before the removal, or other handling, of any contaminated earth or absorbents, the details of the hazardous properties of any contaminant will be obtained and supplied to any contractor. Material Safety Data Sheets (MSDS) are held for all materials that are used on the site. In the unlikely event that these are not available then contact will be made with the supplier to obtain the details.

## **8.5 Organisations to be Consulted**

Britannia Refined Metals Ltd has contact details for notification of an external emergency, and will, during and after a multi-agency response or recovery, consult with relevant bodies including Kent County Council, Gravesham Borough Council, Dartford Borough Council, Environment Agency and Port of London Authority etc. seeking professional advice and guidance as required.

## **8.6 Biodiversity Considerations**

The primary means by which biodiversity could be affected is through waterborne contamination. Damage to and trampling of semi-natural habitats during any operational response, including intertidal mud, also has potential to impact negatively upon biodiversity.

Key biodiversity considerations in the event of an incident impacting upon the tidal River Thames and Botany Marsh are:

1. Ensure early alerting of the Environment Agency and Natural England.
2. Seek to ensure that any discharge or run-off into the tidal River Thames, Botany Marsh and their environs is prevented / limited.
3. Ensure that clean-up interventions and locations for contractor compounds and access routes consider carefully and seek to mitigate potential negative impacts upon semi-natural habitats.

## **8.7 Predicted Environmental Impacts of Accidents**

The predicted environmental impacts of an accident at Britannia Refined Metals Ltd relate to the presence of dangerous substances which are harmful, toxic or very toxic to aquatic organisms and have the potential to cause long-term adverse effects in the aquatic environment.

## **8.8 Action by the Environment Agency**

The Environment Agency has a response capability and established plans and procedures which will be invoked at a scale and within the time-frame commensurate with the type of water and/or land pollution which could result from an uncontrolled loss of hazardous substance from the site, should that occur. They will give advice and guidance to the Company on such issues.

They will also liaise with water companies in respect of material entering the drainage or sewerage systems, or which may possibly affect the water table and subsequently ground water abstraction points.

## **SECTION 10 – Maps Plans and Photographs**

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### **10.1 Photographs**

- Figure 1: Britannia Refined Metals Ltd – Front Site Entrance
- Figure 2: Britannia Refined Metals Ltd – Unmanned Secondary Entrance
- Figure 3: Example of Onsite Flood Gate
- Figure 4: Tidal River Thames Defences from within Site

### **10.2 Maps**

- Figure 5: Area Map
- Figure 6: Aerial view of Britannia Refined Metals Ltd

**Figure 1: Britannia Refined Metals Ltd Front Site Entrance**



**Figure 2: Unmanned Secondary Entrance**



**Figure 3: Example of Onsite Flood Gate**



**Figure 4: Tidal River Thames Defences from within Site**



Figure 5: Area Map

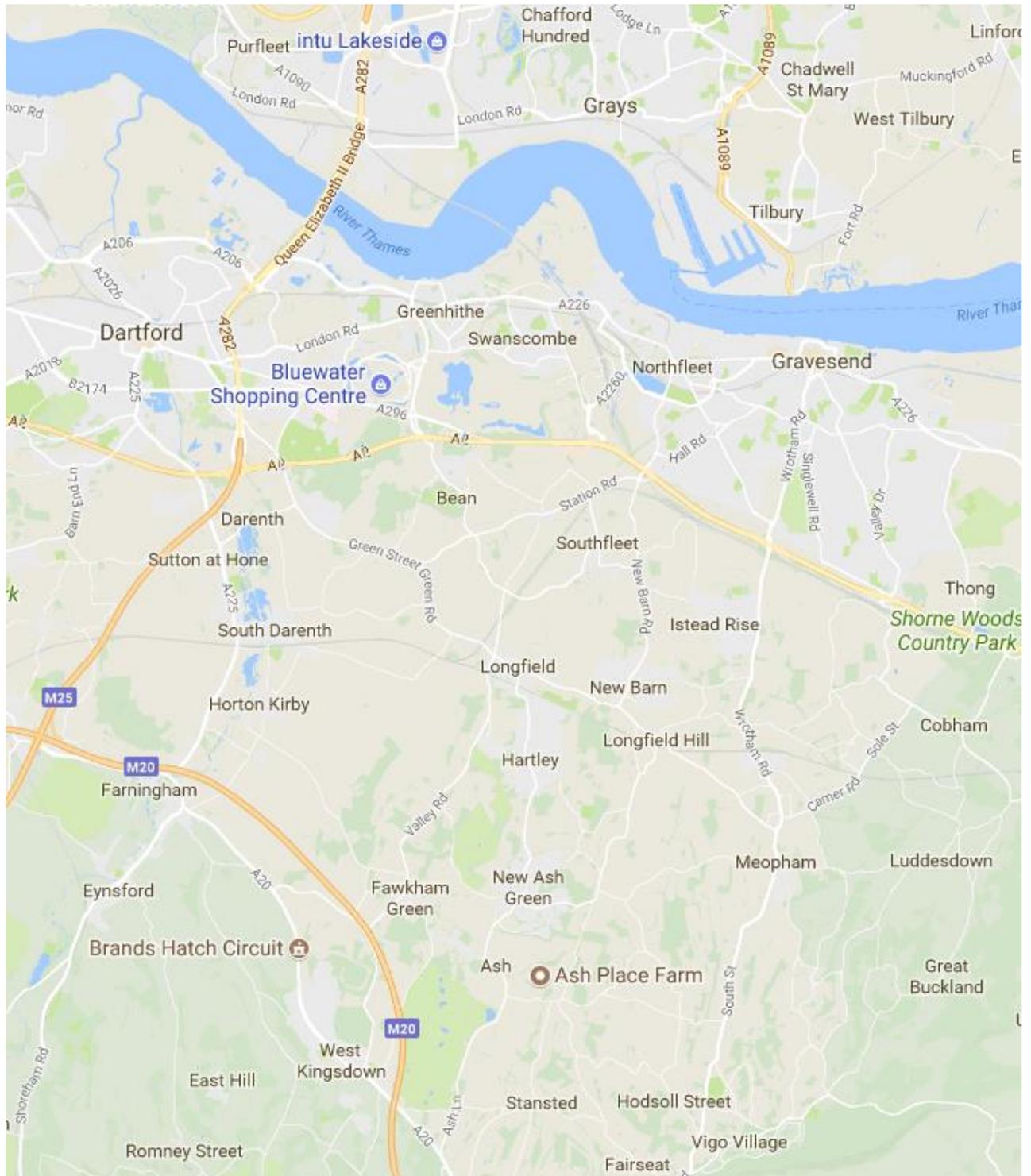


Figure 6: Aerial View of Britannia Refined Metals Ltd



### Annex 1 – The Alerting Chain

