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

External Plan

Givaudan UK Ltd
Kennington Road
Ashford
Kent
TN24 0LT

If you are responding to an incident, please go straight to Page 8: "Quick Guide to Emergency Response"

Version 1.6

Oct 2022

Next Scheduled review date: March 2025

KCC Resilience and Emergency Unit is accredited under ISO14001 (Environmental Management)

Distribution

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Amendments

Version	Amended By	Date Amended
Version 1.1	Peter Lovick / Tony Harwood	March 2013
Update 1.1	Peter Lovick / Tony Harwood to update contacts	April 2013
Update 1.2	Guy Gardener – to update contacts and take account of new regulations	April 2016
Update 1.3	Sian Deller to update	March 2019
Update 1.5	Matt Sandwell - light touch review of contacts and maps/images, plus addition of emergency contacts flowchart	March 2022
Update 1.6	Matt Sandwell - updating of Environmental Sensitivities Map and Site Plan to reflect up-to-date changes to site and surrounding area	October 2022

Any changes or amendments to this plan should be notified in writing to:

Kent County Council, Resilience and Emergencies Unit,
County Emergency Centre, Invicta House, County Hall, Maidstone, Kent ME14 1XX
Telephone: 01622 675570
Electronic Mail: *emergency.planning@kent.gov.uk*

Contents

Quick Guide to Emergency Response

1. Take sufficient details of the incident to enable you make a decision about the county council's response. If the call is during the night, take the caller's details and call back in a couple of minutes once you are awake and have your log book and this guide to hand. Use the METHANE mnemonic to help capture the information you will need.

   M Major incident declared?

   E Exact Location

   T Type of incident

   H Hazards present or suspected

   A Access – routes that are safe to use

   N Number, type, severity of casualties

   E Emergency services present and those required

2. Start a handwritten log book.

3. In the event of an emergency it is crucial that within the first hour that the DEPO stands up and informs relevant organisations and parties using contacts on page 40.

4. If the County Emergency Centre at Invicta House is mobilised it may be appropriate to work from this location.

5. You may be required to attend or dial-in to a multi-agency Strategic or Recovery Co-ordinating group meeting at Police Headquarters, Maidstone.

6. 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. A dedicated BT Meet Me account has been established to support telephone meetings out of hours.

7. Hand your completed log book(s) for archiving purposes to the DEPO when your involvement in the incident response / recovery ceases.

However, remember that;

- The initial call may not provide all the information you need. Don't be afraid to ask for further information, either from the source or from another officer or agency.
- Logging must start immediately. Write your briefing notes as you take the call, do not wait until afterwards.

M	Major Incident? (KCC or other agency)
E	Exact Location? (Postcode / grid reference / landmark)
T	Type of Incident?
H	Hazards?
A	Access? (Routes to the site and within the site)
N	Number of Casualties?
E	Emergency Services in attendance or required?

- Log all alerts, whether or not any action is taken, and capture the rationale behind your decision.
- You should not attend the scene of an incident. Doing so will interfere with your primary role of acting as Duty Emergency Planning Officer for the county council's response to the emergency
- Some incidents do not require us to take any action. You may be alerted for information only, or you may be alerted to an incident where the county council's involvement is unnecessary or can be handled as part of business as usual. However, if the situation develops you should be ready to respond.

Section 1 - Purpose and Activation

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 and/or damage to persons, the environment and property;
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 agencies;
5. How the restoration and clean-up of the environment following a major accident will be undertaken;
6. The agreed roles and responsibilities of the response organisations;
7. The integration of the emergency response; and
8. How the requirements and objectives of the COMAH Regulations are met.

It is supported by the detailed emergency/contingency plans and/or operating instructions of each of the response agencies.

It also integrates with the On-site emergency plan and uses information supplied by Givaudan UK Ltd and contained in the Site Safety Report approved by the Health & Safety Executive and On-Site Emergency Plan.

It is important to note that the HSE has determined that this External Plan should be prepared in respect of potential adverse environmental impact on the adjacent River Great Stour and ground contamination. 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 On-Site Major Accident Declaration - Criteria

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

1.4 Responsibility for On-Site Declaration of a Major Accident

The decision as to whether any incident is major, or minor is determined by a Givaudan employee who is fulfilling the role of the Incident Supervisor.

The system used to contact the Incident Supervisor is dependent on the operation of the site at the time of the incident;

1.5 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) are very low, it is recognised that they could occur. The major risks to the site are: -

1. Spillage of highly flammable or flammable chemicals
2. Fire
3. Explosion
4. Spillage or release of otherwise hazardous liquids or vapours to the environment (air, land or water)

Except for the case of a spillage of corrosive or flammable liquid from a road tanker or from a drum load being transported by Fork Lift Truck or other similar vehicle on one of the site roads, it is envisaged that the above risks, capable of creating **immediate** threat to life, would be confined to the following buildings or locations: -

1. Compounding, warehouse and the bulk storage tanks
2. Science and Technology Laboratories (TSSC)
3. Creative Centre (natural gas supply to the plant room)
4. Meadowview Restaurant and Training building (natural gas supply to the plant room)
5. Operations and Administration building (natural gas supply to the plant room – north side)
6. Premier Foods boiler house (located adjacent to Research building)

In more detail, one or more of the following (or similar) incidents could occur causing a major emergency:

a) Highly flammable or flammable chemical release

A substantial release of a material with a low flashpoint may come from pipeline failure, storage tank failure or rupture, failure of a road tanker, gross operator error, erosion/damage to a drum or sabotage.

b) Major fire Hazards

i) Compartmental Fires

Possibly occurring within an office building or indoor process area.

Sources of fuel could be flammable liquids, paper / plastic / wooden material, or oxidising agents.

Ignition sources could be arson, hot work (maintenance), electrical equipment failure, smoking within a designated No Smoking area, spontaneous combustion (most commonly of rags soaked in aldehydes). Other sources may include static electricity, heat by conduction, convection, radiation or by natural causes e.g. lightning.

ii) Pool fires

Possibly occurring from a spillage of flammable liquid into a bunded area or spillage from a road tanker whilst discharging or as the result of a road traffic accident on the site.

Ignition sources could be hot work (maintenance), electrical equipment failure, smoking within a designated No Smoking area, static electricity, heat by conduction, convection, radiation or by natural causes e.g. lightning.

iii) Torch or Jet Fires

Spray leak from a pumped line of flammable material or bulk storage tank, where:-

Ignition sources could be hot work (maintenance), electrical equipment failure, failure to comply with a No Smoking area, static electricity, heat by conduction, convection, radiation or by natural causes e.g. lightning.

iv) Flash Fire

May occur when charging drums of flammable material, where static is the most prominent ignition source.

c) Explosion

The possible causes of an explosion could be;- a gas explosion (from a natural gas pipe), over pressurisation of a boiler or pipeline from proprietary gas storage bottles (hydrogen stored for use with GLC or similar analytical instrumentation, a dust explosion created whilst charging crystals to a mixing vessel or sabotage, e.g. bomb.

d) Liquid or solid spillage on the site to a yard or drain

A release of liquid or any chemical to an unbunded drain could cause serious damage to the Southern Water Treatment Works. These procedures require Givaudan to contact SWS at the earliest opportunity.

e) Liquid or solid spillage to the River Great Stour

A release of any liquid or chemical to the River Great Stour is a serious environmental incident, which may attract a large amount of media attention. Causation may be firewater run-off, drum or container spillage, loss of the contents of a tanker or pipeline failure. In all cases the EA must be contacted at the earliest possible opportunity. The KCC Emergency Support team must also be advised in order that they can consider initiating the External Emergency plan.

Flooding caused by heavy rainfall and rising water levels in the adjacent River Great Stour may cause contamination of the river water. Whilst these procedures cover the removal of drums, packages and other stored items from the area before the area floods, small spillages or material collected in drains may cause contamination of the river water. This situation should also be alerted to the EA as soon as it occurs.

f) Release of hazardous vapour to the atmosphere

A substantial release of a material with a low vapour pressure may come from pipeline failure, storage tank failure, failure of a road tanker, gross operator error, erosion/damage to a drum or sabotage. Some of these materials are hazardous and the fumes can be irritants.

Other sources of vapour release may occur during the loss of control as a result of a gas leak (from a natural gas pipe), over pressurisation of a boiler or pipeline, or sabotage.

In addition, Hydrogen is stored in proprietary gas storage bottles in two locations on the site. A failure in a pipeline, gross operator error, or sabotage are the most likely causes of an incident with these types of bottles.

1.6 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.

1.7 Responsibility for Activating the External plan

The following Givaudan UK Ltd personnel are responsible for activating the External Emergency Plan:

1. Environmental Health & Safety Manager; or
2. Incident Controller (normally the Production Manager)

In certain circumstances the external plan would be activated by the Kent County Council (KCC) Duty Emergency Planning Officer (KCC DEPO) (See Section 1.9 below).

1.8 How the External plan will be activated

Givaudan UK Ltd personnel will make a '999' telephone call to one of the emergency services whenever a major accident has occurred, or an uncontrolled event has occurred which could reasonably be expected to lead to a major accident.

A '999' telephone will be made using the M/ETHANE: Aide Memoire, page 8, requesting attendance by:

1. Kent Fire and Rescue Service
2. Kent Police

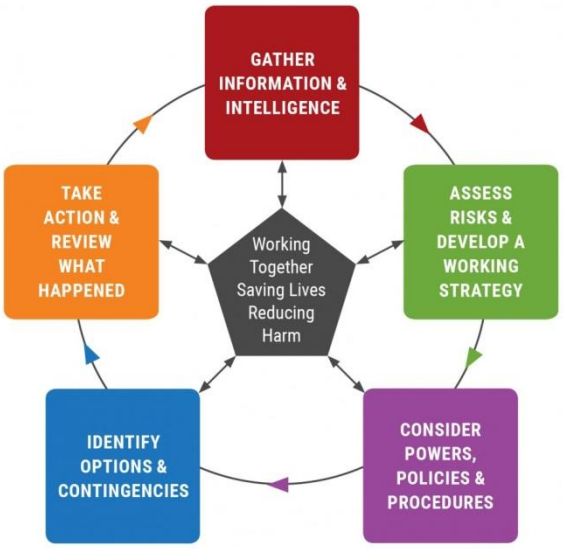
If there are casualties a request should also be made for attendance by the South East Coast Ambulance Service.

Givaudan will also call and brief responders on situation pertaining on site.

1. KCC Emergency Planning Duty Officer
2. Premier Foods and Southern Water Treatment Works The following information will be given to each emergency service (and other responders in due course):
    1. Givaudan UK Ltd, Kennington Road, Ashford TN24 0LT
    2. It is a top-tier COMAH site and are activating the external COMAH Plan
    4. Details of the incident (or potential incident)
    5. Casualties
    6. Actual or potential hazards for responding services
    7. Access point for emergency services' vehicles
    8. Location of on-site Rendezvous Point (RVP)
    9. That it has or may impact adversely on the environment
    10. Any other relevant information
    11. Contact telephone number

M / ETHANE: Aide Memoire (Site/Scene)

M Major Incident
E Exact Location
T Type of Incident
H Hazards
A Access
N Number of Casualties
E Emergency Services in Attendance or Required



Generic emergency planning procedures dictate that Kent Police must alert (and liaise) with the KCC DEPO on a major accident being declared. This protocol ensures a "double-lock" on alerting.

If:

1. The KCC Emergency Planning Duty 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, 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 KCC Emergency Planning Duty Officer who will ensure that action outlined at a) above is taken.

1.9 Reviewing and Exercising

This plan will be reviewed and where necessary revised at suitable intervals not exceeding three years. Reviews of the plan will consider changes occurring within the Givaudan UK Ltd site, the emergency services and other agencies, legislation, emergency planning philosophy, experience and lessons learned from operational response and through exercising and testing this and similar plans.

The plan will be tested by either live deployment on site, table top or paper feed exercises at least once every three years. All reasonable steps will be taken to ensure involvement in exercises by all agencies concerned in response and recovery. Individual components of the plan may be tested separately.

Section 2 - Outline Responsibilities

2.1 Givaudan UK Ltd

a) Initial Actions

1. Ensure the safety of personnel on site;
2. Ensure that the on-site plan has been activated;
3. The Gatehouse to alert the emergency services and Givaudan Incident Supervisor;
4. Advise the emergency services that they are triggering the External Plan;
5 Alert KCC Duty Emergency Planning Officer;
6. Ensure environmental protection measures are implemented;
7. Ensure that an on-site (RVP) is identified and communicated to the emergency services for initial attendance;
8. Ensure that a Company representative attends the RVP to assist incoming emergency services;
9. Assemble the Incident control team and the communications Team
10. Advise the adjacent premises operated by Premier Foods Ltd and downstream Southern Water Wastewater Treatment Work;
11. Arrange for a chronological log to be kept of all significant actions taken;
12. If appropriate, provide copies of Product Data Sheets to the emergency services;
13. Assist with the communications strategy and dissemination of Public Information;
14. Alert farmers licensed to abstract water from the river; and
15. 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 and Environment Agency;
3. Gather and preserve evidence in anticipation of an investigation;
   (NB! If death or serious injury has occurred and /or there has been sabotage the police will treat this as a crime scene. They will want to gather the evidence).
4. Inform relatives in liaison with the Police regarding any accident to employees;
5. Enter the details of the emergency on all relevant accident notification forms; and
6. Arrange for liaison/representative at the strategic and/or recovery working 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 Givaudan, Police, Ambulance, KCC Duty Emergency Planning Officer and the Environment Agency at the emergency control centre.

2.3 Kent Police

The primary areas of 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 Emergency Planning Duty Officer;
6. Carry out a dynamic risk assessment as necessary;
7. Establish communication with site and other responders;
8. Identify, through liaison with EA and KFRS, safe approach routes to the site if necessary;
9. Deploy staff to the 'On Site RVP';
10. Deploy an Officer to the Site Emergency Centre;
11. Set up an external tactical 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 the 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 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 control and/or Site Emergency Centre;
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 to safeguard and collect evidence for subsequent enquiries and possibly, criminal proceedings; (See above re Givaudan collecting evidence).
21. Investigate any potential breaches of the 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 United Kingdom Health Security Agency United Kingdom Health Security Agency (UKHSA)

5. Identify safe approach route after a dynamic risk assessment;
6. Direct Ambulance crews to the on-site Rendezvous Point;
7. Deploy an Ambulance Manager/Officer to tactical Control and/or Site Emergency Centre;
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 on-site 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: Resilience and Emergencies

1. Receive alerting calls from Givaudan UK Ltd, Kent Police and/or Kent Fire & Rescue Service;
2. Commence an incident log;
3. Ascertain details of the incident;
4. Confirm that Givaudan UK Ltd has activated the COMAH External Emergency Plan;
5. If Givaudan UK 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 Ashford Borough Council 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 Highway Services in relation to transportation implications and drainage infra-structure and equipment requirements;
10. Liaise with KCC Flood Risk and Natural Environment team 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; Liaise with KCC
13. Co-ordinate Voluntary Sector if required

It is essential that the Environment Agency, as lead agency for river pollution, is always informed given that this is the most likely consequence of a release of chemicals.

2.6 Ashford Borough Council

1. Receive the alerting call;
2. Send a Local Authority Incident Liaison Officer (ILO) to Givaudan 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 Borough 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 Givaudan Site 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 the Fire Service and Highways Authorities 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

	Water Company: -	South East	Southern
1.	To receive initial information of incident.	√	√
2.	Provide expertise, as required, to support emergency response and recovery	√	√
3.	Provide Liaison Officer at Site Emergency Centre if requested	√	√
4.	Provide Liaison Officer at Local Authority Emergency Centre if requested	√	√
5.	Dispatch 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 Givaudan UK 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 United Kingdom Health Security Agency United Kingdom Health Security Agency (UKHSA) Kent Health Protection Team (South East)

The UKHSA Kent Health Protection Team (South East) will be supported, if require, by the Centre for Radiation, Chemical and Environmental Hazards (CRCE) 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 CRCE, 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 GP's, 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 England South East

NHS England South East 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 England South East will work closely with the Health Protection Agency who will provide the expert health protection advice. NHS England South East will:

1. Receive alert from Emergency Services and/or KCC Emergency Planning
2. Coordinate the health response to the incident
3. Arrange for CCGs to provide input to Tactical Co-ordination meetings;
4. Assist the HPU to assess any potential risk to the population;
5. Cascade information (including that provided by the UKHSA) to GPs and responding NHS Staff;
6. Contact provider organisations who provide health care support to rest/reception centres (if required)
7. Assist with the dissemination of public information;
8. Liaise with UKHSA over health aspects of agreed media statements/interviews. (Police lead on this initially); and
9. Liaise with other agencies to ensure an appropriate response in the recovery phase.

Section 3 – Site information

3.1 The Company

Givaudan is a global company with its Corporate Head Office in Geneva. Creating and producing fragrances and flavourings used worldwide in a range of consumer products. Givaudan UK employs approximately 450 staff, a small number working a 24hr shift pattern with some weekend working (see Section 1.4 for working hours and staffing numbers).

The Givaudan UK site includes:

1. Bulk storage tanks (some of which contain the COMAH substances listed in Section 3 of this plan) situated at the southern end of the site, the contents of which are pumped through pipe work to the Fragrance Compounding Building (see Figures 8 and 9);
2. The fully automated High Bay Warehouse in which are stored drums of materials for fragrances where unmanned cranes collect and deliver drums to the production areas;
3. The Fragrance Compounding Building where mixing occurs. It is a 4-story building in which product is fed by gravity from the top to the ground floor where it is dispensed to drums. Highly flammable liquids are used in this area;
4. An engineering workshop;
5. An oral care compounding building including a warehouse facility;
6. A research building containing laboratories and office's
7. Administration offices; and
8. A Creative Centre comprising offices and creative laboratories together with an alternative location for the Site Emergency Centre and from where incident media management would be conducted.

3.2 Site Location

The **Givaudan UK Ltd site** is located on Kennington Road approximately 2 km north-east of Ashford town centre occupying an area of 7.3 hectares.

Adjacent to the north, is the premises of **Premier Foods** (employing approximately 300 people) and whilst this is a separate company and business operation, certain facilities such as HGV access and gate security are shared. There is no physical boundary between the two companies. Together the two sites are surrounded by a security fence on three sides, the fourth boundary, on the west side, being the River Great Stour.

200 metres north of the Givaudan premises, i.e. beyond the Premier Foods site, is a **railway line** carrying, primarily, passenger services. The nearest **housing** in this direction is beyond the railway line at a distance of 500 metres. In amongst this area there is the **City Park** too.

300 metres north-east is the Julie Rose **Sports Stadium** with a seating capacity of 800. Conningbrook Lakes **Country Park** is also part of this area.

South of the Givaudan premises is an improved grassland field with semi-natural vegetation at its boundary with the river channel (within the flood plain) owned by the company and bordered by the River Great Stour, beyond which is agricultural land with the nearest housing, amongst which is a

nursery school, being at a distance of 500 metres. At approximately 1.5 km in this direction is the William Harvey Hospital.

1 km south west is the **Norton Knatchbull School**.

The **River Great Stour**, a small, non-tidal, slow running river, forms the western site boundary beyond which is agricultural land. This river flows from Ashford, through Wye, Chilham, Stodmarsh and Canterbury to Plucks Gutter, where it is joined by the River Little Stour and becomes tidal at this point.

Further west, at a distance of approximately 350 metres, is the **M20 motorway**, a 6-lane dual carriageway carrying high volumes of traffic.

Kennington Road borders the east side of the site. There is a pair of semi-detached houses and a council yard on Kennington Road on its east side opposite the Givaudan Creative Centre/Main Reception. Beyond this lies a detached residence, Conningbrook Manor, otherwise to the east is agricultural land.

Large housing estate (Conningbrook Lakes) located next to Julia Rose Stadium along Conningbrook Avenue.

The Great Stour confluence at Plucks Gutter and Grove Ferry is renowned for its coarse fishing, particularly bream stocks, the lake is also shared by a canoe and sailing club (Pirates Canoe Club) consisting of around 120 members, with varying ages.

3.3 Local Environmental Information

The site is immediately adjacent to the *River Great Stour, Ashford to Fordwich Local Wildlife Site* which is designated because:

"*This stretch of the River Great Stour is largely natural in character and supports a wide range of submerged, emergent and marginal aquatic plants including several which are rare and uncommon in Kent. It includes a substantial chalk river stretch between Wye and Chilham which supports stream water-crowfoot Ranunculus penicillatus and brown trout Salmo trutta. Water quality is good throughout almost the entire length of the river within the Local Wildlife Site.*" (LWS citation).

Designated sites within 1km:

River Great Stour Ashford to Fordwich Local Wildlife Site; and

Willesborough Lees and Flowergarden Wood Local Wildlife Site.

Designated sites within 5km:

1. 11 Local Wildlife Sites (including those above);
2. 80 (approximate) stands of ancient woodland;
3. Ashford Green Corridors Local Nature Reserve;
4. Wye National Nature Reserve;
5. Wye and Crundale Downs Site of Special Scientific Interest;
6. Hatch Park Site of Special Scientific Interest; and
7. Wye and Crundale Downs Special Area of Conservation.

Additional designated sites downstream along River Great Stour corridor:

1. Whitehall Meadows Local Nature Reserve (approx. 21km downstream);

2. Stodmarsh Site of Special Scientific Interest (SSSI), RAMSA R Site and Special Protection Area (approx. 27km downstream).

The designated features of these sites could be harmed by pollutants from Givaudan if they are:

1. Harmful or toxic (H5 / H6)
2. Carcinogens (H7)
3. Toxic for reproduction (H10)
4. Mutagens (H11)
5. Eco toxic (H14)

In addition, some oxidising chemicals (H2), chemicals & mixtures with high BOD and fuels & oils could be damaging.

(See Figure 3 in Section 10 for map of designated sites)

The site does not lie within a groundwater source protection zone.

There are two licensed groundwater abstraction points 440m to north of the site and two 880m to the southwest of the site. Groundwater runs between 1.3 and 3.1m below ground level in a southerly direction therefore any contaminant emanating from the site would not betransported to the northern abstraction points. The two abstraction points to the southwest are on the other side of the River Great Stour which provides a natural barrier.

On the River Great Stour there is one surface water abstraction point within 1 km, and two between 1 and 2km from the site, from which local farmers are licensed to abstract water for irrigation and/or dust suppression purposes. The site operator has arrangements in place to quickly alert those licensees to potential pollution of the river.

Should an uncontained release of hazardous substances from storage tanks occur a possible external consequence would be the pollution of the River Great Stour to the west of the site.

However, the storage area for the substances listed in this Section has permanent concrete bunding designed to contain the entire contents of 2 storage tanks. It would take a considerable loss of the contents of several storage tanks to overtop the bunding. Not all of the storage tanks contain hazardous substances.

The Fire & Rescue Service will also take into account any further protection measures necessary to contain any leakage of those substances and water run-off from fire-fighting operations anywhere on site in order to minimise environmental damage or pollution of the river and ground contamination.

Some of the substances held on site are potentially harmful to the aquatic life in the River Great Stour and different substances will behave differently on contact with water, either dissolving, solidifying or floating.

3.3.1 Habitats

Downstream of the works, there is Coastal and floodplain grazing marsh, a priority Biodiversity Action Plan habitat for the Environment Agency.

In the event that pollutants from Givaudan were to be dispersed in the river, the likelihood of harm to this type of habitat is low. This assumes that all downstream abstractors are informed of the need to cease abstracting until the concentration on of pollutants is shown to be low.

3.3.2 Species

The river is known to contain populations of the following fish species, with status and protection by legislation, as given:

1. European Eel (Anguilla anguilla) (BAP Priority Species; NERC Sc 41 & 42; Eels Regulations 2009; SAFFA 1975 (as amended)
2. Brown / Sea Trout (Salmo trutta);NERC 2006 Sc 41 & 42; BAP Priority Species; SAFFA 1975 (as amended)
3. Bullhead or Miller's Thumb (Cottus gobio); BAP Species; EU Habitats Directive Annex 2; SAFFA 1975 (as amended)
4. There are other, coarse fish species in the river which also benefit from general protection under the SAFFA (as amended). Salmon (BAP Priority Species and protected under NERC Sc 41 & 42, SAFFA (as amended)) have also been reported in the estuary and so could be present in the river and affected by a pollution incident.

Other species of nature conservation interest in the Great Stour and marshes include:

1. White-clawed Crayfish (Austropotomobius pallipes); Schedule 5 of Wildlife and Countryside Act 1981, listed under the EC Habitats Directive, included as a priority species under the Bern Convention and is on the IUCN Red Data List for endangered and threatened species. Priority species under the UK Biodiversity Action Plan.
2. Shining Ram's-horn Snail (Segmentina nitida); NERC Section 41

3.4 Site Hazards and Risks

As part of the COMAH planning process the Company commissioned an environmental assessment of a variety of potential chemical release scenarios. Results of the assessment suggested that there could, in extreme circumstances be a hazard to persons on site and the on- and external environment as a result of events including: -

1. a breach of storage tanks
2. breaches in pipelines
3. spillages whilst road tanker loading/unloading is taking place,
4. contaminated water run-off from fire suppression
5. contaminated water from other firefighting operations.

In respect of incidents occurring within buildings, spills and their effects, and the consequences of a fire, can reasonably be expected to be contained and resolved within the building concerned.

Bunding and drainage measures in place can reasonably be expected to minimise the impacts of contamination.

The worst-case risk to the environment would occur if the maximum inventory of a bulk liquid or liquids dangerous to the environment were to be released from the site. The site is covered with concrete and tarmac and storage tanks are surrounded by concrete bunds to prevent this from happening and any liquid collecting as surface water will flow to a concrete interceptor of 125m ^{3} capacity and be pumped from there to the nearby Ashford Sewage Treatment Works, that transfer being controllable from the site. On-site procedures exist specifying the actions to be taken if a chemical spillage occurs.

(Each tank has a capacity of 20 to 24 tonnes)

3.7 Risk Categories:

1. H411: Toxic to aquatic life with long lasting effects
2. H317: May cause an allergic skin reaction
3. H315: Causes skin irritation
4. H319: Causes serious eye irritation
5. H410: Very toxic to aquatic life with long lasting effects
6. H302: Harmful if swallowed
7. H361: Suspected of damaging fertility or the unborn child
8. H226: Flammable liquid and vapour
9. H304: May be fatal if swallowed and enters airways

3.8 Safety Phrases

S24 Avoid contact with skin S37 Wear suitable gloves

S60 This material and its container must be disposed of as hazardous waste

S61 Avoid release to the environment. Refer to special instructions/safety data sheet

S62 If swallowed do not induce vomiting; seek medical advice immediately and show this container or label

OEL Occupational Exposure Limit

3.9 Harmful effects to persons and the environment

The harmful effects of the dangerous substances held on site are shown in the table at paragraph 3.7 above.

Further Information is contained in Material Safety Data Sheets (MSDS) which are available through the Company Regulatory and Product Safety Team and via the Site Incident Control Centre.

3.10 Potential Pollution Pathways

The main event having the potential to adversely impact on the river and ground would be a large release in the tanker offloading area which could occur via three pathways: -

1. Over ground direct to the River Great Stour. **(Pathway A)**
2. Through cracks in the ground and then to the river, via ground water. **(Pathway B)**
3. In to the effluent system and then to the Water Treatment Works. **(Pathway C)**

Pathway A - Over ground direct to the River Great Stour

The only way in which water from the site can enter the river directly is through surface water draining into it via the site car parks. The tanks in which environmentally hazardous products are

stored are bunded and any liquid spillage of substances harmful to the environment will be contained within the bund and pumped out into appropriate vessels. Should the bunding be over-topped spillages and any run-off water or firefighting foam would further dilute the spilled substance and enter the site surface water drainage system to be dealt with as described in Pathway C below.

River flooding into the south east corner of the site adjacent to the storage tank area can occur and provide a similar pathway to the river if a release happens at the same time. The flood risk has been reduced through the creation of artificial flood plains upstream at Hothfield to the north of Ashford town centre.

The Company possesses and will deploy, if required, a floating boom on the river to collect and hold for retrieval any material floating on the surface of the water.

Pathway B - Through cracks in the ground and then to the river, via ground water.

In event of any faults in the concrete or tarmac covering the site or spillage on to grass areas and verges, substances could migrate through the soil to the ground water and accumulate, over a considerable period of time, as a plume. The release could impact on the land and the ground water between the site and the River Great Stour if no spill containment action were taken.

Pathway C - Into the effluent system and then to the Water Treatment Works.

Surface water normally flows to the site interceptor and is pumped from there to the Waste Water Treatment Works by pipeline. There are procedures in place in the on-site response that specify the isolations (i.e. stopping the flow to the Works) that will be carried out if a chemical spillage occurs, and the process of notification of the Treatment Works. The prompt application of defined spillage procedures would retain any loss of containment within the drainage and effluent systems.

3.11 Potential Consequences of Pollution

Most of the environmentally hazardous products stored in bulk are insoluble or sparingly soluble in water. Some would also solidify in water. If material were to flow from the site to the Waste Water Treatment Works it could carry environmentally hazardous substances in small quantities, which could have an adverse effect on bacteria at the sewage treatment works. However due to the low solubility of the substances and the high dilution impacts are likely to be small. There are procedures in place to alert the Treatment Works in the event of a release such that the release could be contained at the works. It is estimated that this scenario could cause a minor effect to water treatment works processes.

Fire-fighting water could originate either from operation of the sprinkler system in the Fragrance Compounding Building or the High Bay Warehouse, or through the application of water by the fire and rescue service at any part of the site.

The worst-case consequences would emanate from fire in the High Bay Warehouse. This water may contain a range of substances (dissolved or suspended) with potential adverse effects on the aquatic environment. Any of the dangerous substances on site could be present in the fire fighting water depending on the scenario involved. Water used to extinguish a fire in many parts of the site would flow to the interceptor via the site drainage system. However, it is not impossible that run-off could escape from certain areas and seep into the ground.

3.12 On-site Emergency Control Centre

Located within the secure area of the site in a designated room on the ground floor of the Administration building. It has pre-positioned equipment and communications facilities together with plans and details of the types, locations and emergency response procedures in respect of locations and substances on site. It will be where the incident response will be co-ordinated from. Access is via primary or secondary site access gates. (See Figure 2 and Figure 4 in section 10)

3.13 Site Secondary Emergency Control Centre

The “old board room” within the Creative Centre / Main Reception building, on the Givaudan UK Ltd complex, close to but outside the secure area.

3.14 Tactical Co-ordinating Group

Will be accommodated In the On-Site Emergency Control Centre or Secondary Emergency Control Centre.

Section 4 – External Response Information

4.1 External Rendezvous Points (RVP)

As the incident develops and if the need arises for external Rendezvous Points (RVPs) they will be established by the emergency services. All emergency, specialist and support services will be directed there as appropriate.

The emergency services will decide, according to the prevailing circumstances, operational factors, including wind speed and direction and advice from the Company or Kent Fire & Rescue Service, whether an external RVP is necessary. Given the limited effect of any loss of hazardous material from storage tanks, there are various options for RVPs within and adjacent to the secure area of the Givaudan site.

4.2 External Tactical Co-ordinating Group

Should circumstances require it, a location for an external Tactical Co-ordinating Group will be determined by the emergency services.

It will always be the safest and most appropriate location from which tactical command can be managed.

4.3 Tactical Holding / Marshalling area

It is unlikely that an external Tactical Holding or Marshalling area for any of the responding emergency services is necessary, appropriate locations will be determined by the emergency services.

4.4 External helicopter landing zones

Locations cannot be pre-identified: individual pilots will determine them at the time, following a dynamic risk assessment.

There are, however, various nearby options including car parks and open ground within, adjoining or adjacent to Givaudan UK Ltd and Premier Foods premises, and at the nearby Julie Rose Sports Stadium.

4.5 Domino sites

The competent authority designates domino sites as 'establishments where the likelihood or consequences of a major accident may be increased because of the location and proximity of other establishments in the group and the dangerous substances present there'. (See Regulation 16.1).

There are no such domino sites applicable to Givaudan UK Ltd, Ashford.

Section 5 – Public Information

5.1 Public Information Zone (PIZ)

The Health and Safety Executive have determined that as the potential consequences of a major accident are environmental only, COMAH Regulation 14(2) which relates to "persons liable to be affected by a major accident" is not applicable and have set a Consultation Distance of zero.

Therefore, as the Consultation Distance equates to the Public Information Zone there is no requirement to provide public information as required by Regulation 14(1) including to the adjoining premises of Premier Foods.

However, during any incident, (e.g. where smoke 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.

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 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 River Great Stour 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 and Environment Agency hold contact details for river users and will utilise those contacts to disseminate relevant information.

5.4 How the public will be notified of the conclusion of an incident

When the relevant information is available a decision will be made by the Environment Agency in consultation with other responders including HSE as necessary.

The method(s) of notification will be dependent on the nature and extent of the incident but will include media releases and contact with farmers and those organisations known to be river users. 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

6.1 General

In the response to any accident (in accordance with Regulation 14 COMAH Regulations 2015) Givaudan UK Ltd has the responsibility to warn and inform the public within the Public Information Zone (PIZ), but as the PIZ has been set at zero this is not relevant

The strategy states the need to;

> *'Provide clarity of purpose and direction to partners in respect of multi-agency partnership work to communicate with the Public and Media before, during and after emergencies, by ensuring that effective and robust arrangements are in place'.*

6.2 Initial Response and Strategy

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

The Givaudan UK Ltd Communications Officer will liaise with the response and recovery organisations media officer(s) to ensure a co-ordinated approach to the media.

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 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.

The 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 (depending on the scale of the incident) and in each case the Environment Agency will be closely involved in all media matters.

6.4 Givaudan UK Ltd Media Management

Givaudan will provide:

1. The media contact for Givaudan UK Ltd will be through the Corporate Communications Control Team.
2. Givaudan UK Ltd has nominated an onsite office within the Creative Centre / Main Reception building as a Media Briefing Centre.
3. Factual details of the cause of the accident.
4. Factual details relating to the company's response

Section 7 – Recovery

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 Givaudan UK 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 River Great Stour.

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 Givaudan UK Ltd. will usually be led by either the County or Borough Council, 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 the 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 Givaudan UK 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 Givaudan UK Ltd site, this is likely to be an Environment and Infrastructure sub-group.

Section 8 – Environmental Protection

8.1 Site actions for the management of environmental clean-up, restoration and waste disposal

Givaudan UK 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 direct result of fire through fire water runoff, or spillages from static or mobile vessels or containers. External contamination is likely to consist of organic chemical mixtures containing fragrance chemicals plus combustion products and residues from the fire. A significant number of these have the potential to cause damage to the environment.

Contamination of drains and water courses,**(**namely the adjacent River Great Stour and the on-site surface water drainage system which feeds, via the site interceptor, to the nearby Waste Water Treatment Works) will potentially arise from fire water run-off, the spillage of fragrance or oral care materials or a loss of containment of chemicals.

Airborne contamination may arise from fires or uncontrolled emissions from scale up/small scale production operations within the Pilot Plant.

8.2 Post Incident Clean Up Procedures

On-Site Equipment

In general, 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, a floating boom (for skimming the surface of the River Great Stour or removing oil layers from the interceptor) and a number of spillage kits (various - containing a mixture of socks, absorbent sheets or other absorbent materials). 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 a number of contractors and external specialists who can provide a 24hr response with expertise and equipment necessary to supplement the site response arrangements. See Section 9 for details.

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. Fragrance

MSDS's are routinely retained by the Regulatory and Product Safety (RAPS) Group either as paper copies or as electronic copies held on a central computer system. 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

The Company 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 Ashford Borough Council, Environment Agency, Natural England 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 river margins also has potential to impact negatively upon wildlife, especially during the spring and summer.

As described in section 3.3 and shown at Section 10 Figure 3, the River Great Stour Ashford to Fordwich Local Wildlife Site is immediately adjacent to the site. While not a statutory designation, Local Wildlife Sites are areas of County importance for biodiversity. The River Great Stour Ashford to Fordwich Local Wildlife Site is of particular importance for its water quality, which supports a range of aquatic, emergent and marginal flora and is important for invertebrates, fish (including brown trout and sea lamprey), mammals (including water vole) and over-wintering birds within the lakes and gravel pits along the course of the river.

A site of international importance, Stodmarsh Special Area of Conservation (SAC), Special Protection Area (SPA), Site of Special Scientific Interest (SSSI) and a RAMSAR site, lies some 27km downstream of the site, providing a mosaic of wetland habitats for internationally important overwintering and breeding birds and other fauna and flora.

Key biodiversity considerations in the event of an incident impacting upon the River Great Stour are:

1. Ensure early alerting of Environment Agency, Natural England and KCC Flood Risk and Natural Environment Team (via KCC Emergency Planning Duty Officer)

2. Seek to ensure that any discharge or run-off into River Great Stour and its 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 sensitive riverside habitats.

8.7 Land use

Primary land uses adjacent to Givaudan UK Ltd are agriculture and nature conservation, with no residential areas in close proximity to the site. There are water extraction points at locations downstream from which farmers are licensed to extract water from the river. Arrangements exist to alert those farmers.

8.8 Hazards to the environment

The hazards to the environment around Givaudan UK Ltd are described in Section 3 of this Plan.

8.9 Predicted environmental effects of accidents

The predicted environmental effects of an accident at Givaudan UK Ltd are as outlined in Section 3 of this plan i.e. 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.

8.10 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 and advise South East and Southern 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. Given the distance from the site of those abstraction points, this eventuality is extremely unlikely

SECTION 10 – Maps Plans and Photographs

10.1 Maps

Figure 1: Ordnance Survey Map of the Ashford and Kennington Area

Figure 2: Ordnance Survey Map showing key locations

Figure 3: Givaudan UK – Environmental Sensitivities Map (EA)

10.2 Plan

Figure 4: Site Plan

10.3 Photographs

Figure 5: Aerial Photograph of Site and immediate surrounding area

Figure 6: Primary Access Point and RVP off Kennington Road

Figure 7: Secondary Access Point Off Kennington Road between Primary Access and Creative Centre/Main Reception

Figure 8: Creative Centre and Main Reception

Figure 9: Storage Tanks

Figure10: Concrete bunding surrounding storage tanks

Figure 11: River Great Stour on west side of site

Figure 1 Ordnance Survey Map of the Ashford and Kennington Area

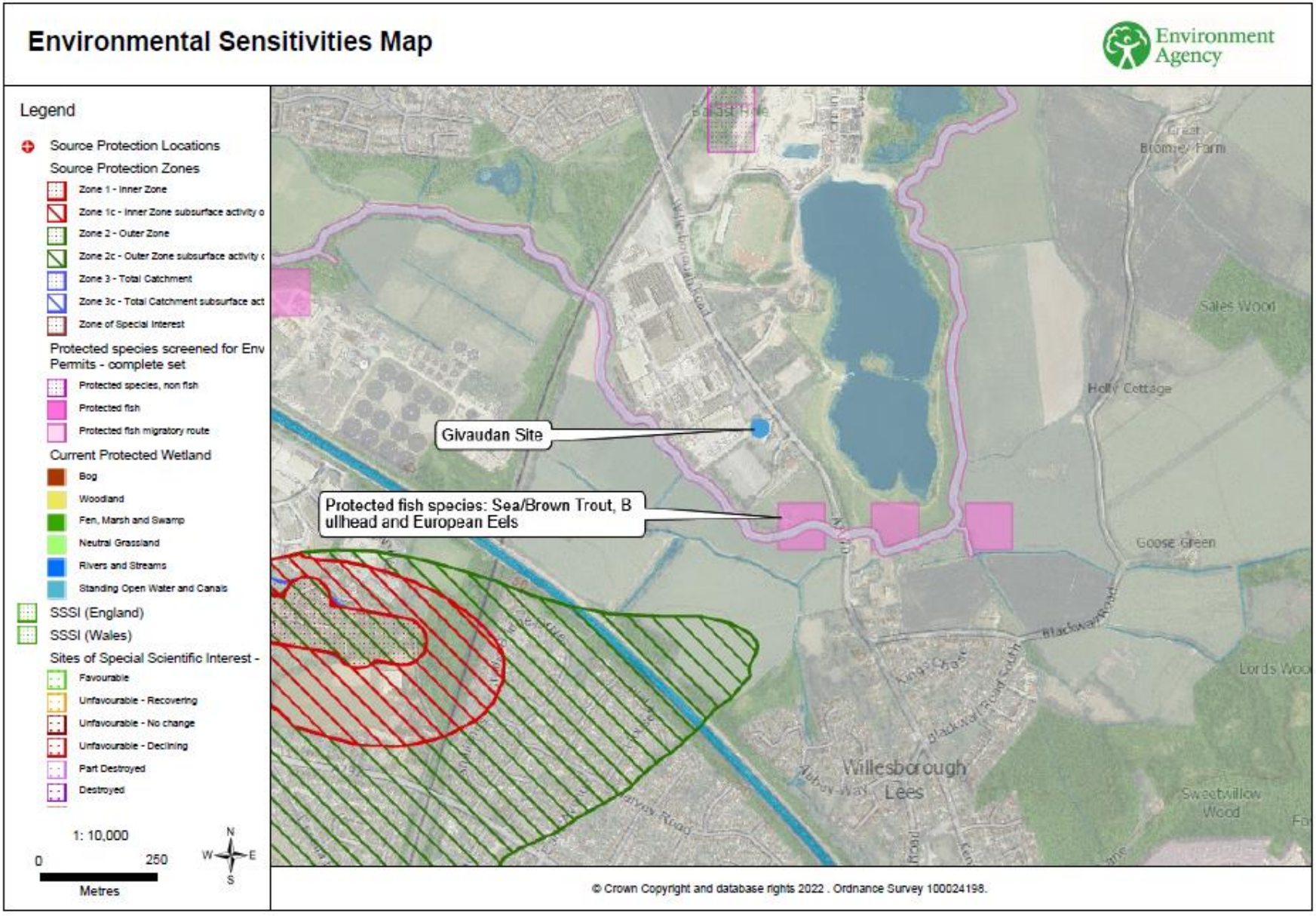


Figure 3 Givaudan UK – Designated Wildlife Sites / aquatic zones

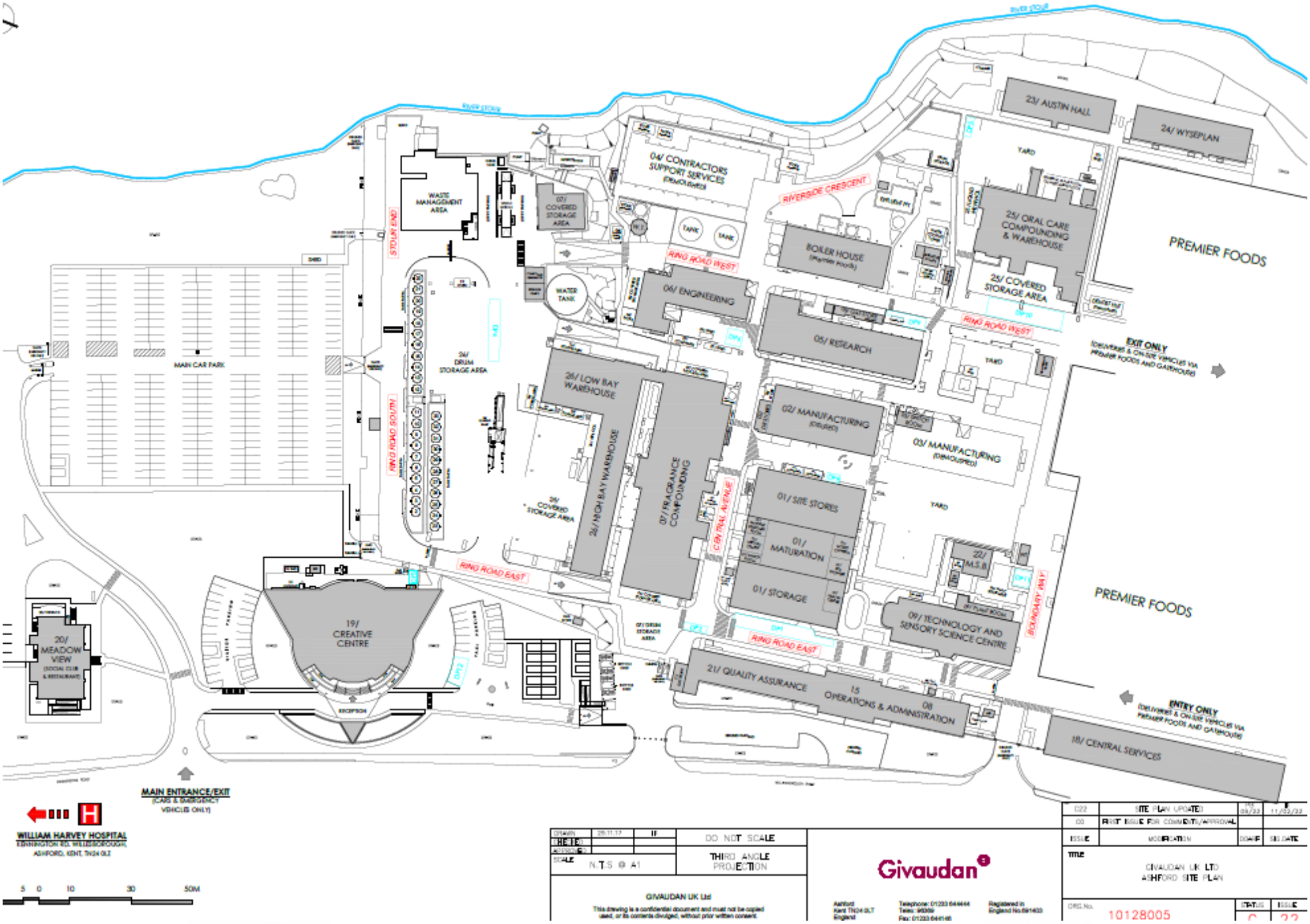


Figure 4: Site Plan

Figure 5: Aerial Photograph of Site and immediate surrounding area

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Figure 8 Creative Centre and Main Reception

Figure 8: Storage Tanks

Figure 9: Storage Tanks

Figure 10: Concrete bunding surrounding storage tanks

Figure 11: River Great Stour on west side of site

Figure 12: Entry slope and dock used by Pirates Canoe Club

Annex 1 – The alerting chain