



Plastica Ltd

Environmental Incident Investigation Policy and Procedure

Created: 08/02/2022

Reviewed: 12/04/24

Version: 2

HS&E 20

1.0 General Statement

It is our policy that all identified environmental incidents will be given the utmost priority and employees are encouraged to promptly report all potential environmental incidents without delay. All identified environmental incidents will be recorded and investigated. In the first instance an Environmental Incident Report will be completed as soon as an incident has been identified. Witness Statement Records are also to be prepared where applicable.

The purpose of this policy is to outline the procedures to be taken upon identifying a potential environmental incident. Therefore, all staff are expected to abide by the following procedures and co-operate with management in the event of an incident. It will also show that we take our environmental management responsibilities seriously and that the causes and consequences of all such incidents can be established. Systems and procedures can then be established to prevent them from recurring. Therefore, all staff are expected to abide by the following procedures and cooperate with management in the event of an incident.

2.0 Legal Position

The law concerning environmental incidents is principally covered by:

- the Environmental Protection Act 1990

Not all incidents need to be reported, however environmental incidents involving damage or danger to the natural environment, pollution, risks to wildlife, spills of hazardous waste should all be reported in the first instance to the enforcing authority. In England, Scotland and Northern Ireland, you can use the pollution hotline number 0800 807060 24 hours a day.

3.0 Definitions

Environmental incident - the release, either accidental or malicious, of a harmful substance.

For example:

- chemical or oil spillage
- accidental release of a harmful chemical to the atmosphere
- accidental release of a harmful substance to the drainage/sewerage system
- accidental release of a harmful substance to a local watercourse.

Major incident - an incident requiring the involvement of a regulatory authority due to the volume or toxicity of the harmful substance released.

Minor incident - an incident not requiring the involvement of a regulatory authority

4.0 Reasons for investigating

The purpose of any investigation of an environmental incident is:

- to ensure that the causes of a particular incident have been rectified
- to understand the extent of environmental harm and the remedial measures required to mitigate it
- to review any environmental risk assessment applicable to the task at hand

- to identify shortcomings in the preventative measures and understand where improvements are needed
- to determine whether any specific breaches of legislation have occurred and prepare insurers, directors and other interested parties to the potential consequences and liabilities
- to increase the company's knowledge and awareness, and identify further training needs for staff
- to demonstrate to the enforcement agencies that the incident has been taken seriously

5.0 Investigation of incidents

All incidents are to be investigated as soon after the event as possible. Minor incidents will be investigated by the manager responsible for the activity. Major incident investigations will be carried out or overseen by the Finance & Operations Director. Investigations will include interviewing those who are familiar with the site and the processes involved. An Environmental Incident Report/COMAH Incident Report is to be prepared to record the facts of the incident. This will also detail any immediate actions that have been taken to mitigate/rectify the situation and any further action which may also be required for remediation or to prevent a recurrence.

The Environmental Incident Report and/or COMAH Incident Report should be supported by photographs and sketches of the incident.

Witness Statements should also be completed by any person involved in the incident, any witnesses to the incident and by those responsible for reporting the incident.

Where appropriate, samples of any substances, including the substance released, soil samples and polluted water samples, should be obtained in order to assess the toxicity and potential effects on the wider environment. Appropriate precautions must be taken to prevent harm to anyone sampling, transporting or handling the test samples. This may require reference to the COSHH assessment and the wearing of suitable personal protective equipment.

Following the collation of the above information, a review of the incident and the circumstances surrounding it should be conducted by the Finance & Operations Director FOD HSFE and/or HR Officer HR HSFE to ensure that the appropriate lessons have been learned, and that all necessary control measures and staff training have been implemented to prevent any recurrence.

Offsite incidents will be taken just as seriously as those on our premises and we will follow the same actions as above.

5.1 Action to be taken on discovering an incident

- if you suspect an incident has occurred, investigate at once but do not take risks
- if you discover an incident - stay calm
- raise the alarm by informing the nearest supervisor/manager
- if it is safe to do so, try to control the incident by isolating plant/equipment and closing off any valves etc. Obtain help if necessary - but do not put yourself or others at risk
- direct all non-essential people away from the affected area
- follow our Spill Procedure
- for larger incidents, it may be necessary to inform the fire brigade, Environment Agency, local authority and/or water company, depending on its nature

- dispose of all waste and contaminated materials properly. If necessary, call Darcy Spillcare on 01732 762338 for information and assistance on disposal options.

5.2 Action to be taken following an incident

Every incident should be thoroughly investigated according to this Environmental Incident Investigation Policy and Procedure. Action should then be taken to ensure that the risk of a recurrence is minimised and that the relevant procedures have been reviewed and updated where necessary.

