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Control of Major Accident Hazards (COMAH)

External Emergency Plan

International Flavours & Fragrances (GB) Limited
Duddery Hill
Haverhill
CB9 8LG

Author:	Joint Emergency Planning Unit on behalf of SRF
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DOCUMENT MANAGEMENT

GENERAL DATA PROTECTION REGULATIONS 2016/679 AND DATA PROTECTION ACT 2018

This plan does not include personal, sensitive or special category data as defined under the General Data Protection Regulations. It does include data/information relevant to achieve planning arrangements and identifies how more specific personal data will be used during any emergency.

FREEDOM OF INFORMATION ACT 2000

This document will be made publicly available through the SRF website. Where content has been redacted under the freedom of Information Act 2000 (FOI) in the publicly available version, the paragraph number will be **highlighted** to show there has been a redaction and the relevant section of FOI referenced.

ENVIRONMENTAL INFORMATION REGULATIONS 2004 (IF REQUIRED)

This plan presumes disclosure of all environmental information, under Environment Information Regulations. Where exemptions are claimed under Environment Information Regulation 12 (5)a, this will only be where one of the responder agencies has judged that the information may adversely affect either international relations, defence, national security or public safety. Where such content has been identified, the paragraph number will be **highlighted** and the paragraph text removed from public versions of the plan.

REVIEW

This plan will be reviewed by the Suffolk Joint Emergency Planning Unit on behalf of Suffolk County Council and the Suffolk Resilience Forum at least every 3 years. Earlier

reviews will take place if there is a change in the working practices carried out by or chemical quantities held by IFF, if there is a change in legislation or if information from other Industrial accidents and exercises where lessons are identified.

Any amendments will be issued by way of replacement page(s). Should significant changes be required, a complete re-issue of the plan will take place.

Glossary:

COMAH	Control of Major Accident Hazard Regulations 2015
DLUHC	Department of Levelling Up Housing and Communities (Formally MHCLG)
Forward Control Point / Forward Command Post (FCP)	Any service's command and control facility nearest the scene of the incident, responsible for immediate direction, deployment and security. This might be an Operational / Bronze or Tactical / Silver facility depending on the circumstances of the incident.
HART	Hazardous Area Response Team (Ambulance)
HSE	Health & Safety Executive
IBC	Intermediate Bulk Containers
Inner Cordon	The inner cordon surrounds the immediate scene to provide security and a measure of protection for personnel working within the area. Suffolk Fire and Rescue Service will maintain and control access to the inner cordon.
JEPU	Joint Emergency Planning Unit
Outer Cordon	The outer cordon controls movement of persons outside the inner cordon. The Police will maintain and control access to the outer cordon.
PIZ	Public Information Zone – area identified by HSE to describe the zone within which public information and warning of potential COMAH hazards is mandatory
RCE	Centre for Chemical, Radiological and Environmental Hazards (UKHSA)
RCG	Recovery Coordinating Group
Rendezvous Point (RVP)	The point to which all resources arriving at the outer cordon are directed to for logging in, briefing, equipment issue and deployment.
SCG	Strategic Co-ordination Group
SRF	Suffolk Resilience Forum
STAC	Scientific & Technical Advisory Cell
Strat.CC	Strategic Coordination Centre
TCG	Tactical Coordination Group
Traffic Control Point (TCP)	To manage the traffic flow in and around the site of a major incident
UKHSA	UK Health Security Agency (Formally PHE)

Amendment Record

Amendment	Date	Amended by	Summary
1	Jan 22	SH	Update re change of title for MHCLG & PHE

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Foreword

This document is the multi-agency External Emergency plan for International Flavours & Fragrances (GB) Haverhill Suffolk (IFF). It details the roles and responsibilities of individual agencies for Suffolk Resilience Forum and other organisations as appropriate for the coordination of emergency response and recovery management in Suffolk.

The plan has been developed in accordance the Control of Major Accidents Hazards (COMAH) Regulations 2015.

Further reference has been drawn from the Health and Safety Executive (HSE) Guide to Control of Major Accident Hazards Regulations 2015.

The plan whilst designed as a self-contained document is produced in accordance with the Suffolk Resilience Forum Emergency Plans protocols, in so far as it is both site specific and commensurate with SRF generic plans

Consultation for developing this document has taken place in accordance with the joint agency protocols of the Suffolk Resilience Forum and Control of Major Accident Hazards (COMAH) Regulations 2015; Regulation 12 - Preparing an internal emergency plan, Regulation 13 & Schedule 4 – Preparing External Emergency Plans, 14 - Reviewing External Emergency plans, 17 & 18 - information provided to the public

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Distribution

The information below details the recipients of this plan, together with their copy number if the plan is issued as a controlled document.

Addressee

Anglian Water

DLUHC Resilience and Emergencies Division

East of England Ambulance Service NHS Trust

Environment Agency

Essex & Suffolk Water

Food Standards Agency

Health and Safety Executive

UKHSA

IFF (GB) Ltd

NHS England

West Suffolk Clinical Commissioning Group

Ipswich and East Suffolk Clinical Commissioning Group

Suffolk Constabulary

Suffolk Fire and Rescue Service

Suffolk Joint Emergency Planning Unit (for Suffolk County Council)

Suffolk Libraries Haverhill (redacted)

Cambridgeshire Resilience Forum

Essex Resilience Forum

Exercise Log

Details the date, type of exercise and any pertinent comments each time the plan is exercised.

Date	Exercise	Type	Comments
20/10/08	Spice	TTX	Multi-agency off-site plan validation (COMAH regulation 11)
09/11/11	SPICE II	TTX	Multi-Agency 3 yearly exercise
1/10/14	Aqua	Live / TTX	Multi-Agency 3 yearly exercise
20/9/17	Aurora	Live /TTX	Multi-Agency 3 yearly exercise
16/9/20	Workshop	Workshop	Workshop completed due to Covid 19 impact on exercises

IFF (GB) Ltd EXTERNAL EMERGENCY PLAN

1. Introduction

1.1 General

1.1.1 International Flavours & Fragrances (GB) Ltd Haverhill (IFF)) has been designated as an Upper Tier Establishment under the Control of Major Accident Hazards (COMAH) Regulations 2015. Suffolk County Council is responsible for producing the External Emergency Plan and this has been undertaken on behalf of the County Council by the Suffolk Joint Emergency Planning Unit

1.1.2 This plan provides information concerning the management and coordination to the response and recovery to the off-site consequences of a major accident, by the multi-agency partners of the Suffolk Resilience Forum and other agencies and organisations as is appropriate, in the event of a major accident occurring at IFF Haverhill.

1.1.3 The regulations define a major accident as:¹

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 of the establishment and involving one or more dangerous substances.

1.2 Aim and Objectives²

1.2.1 The aim of this plan is to detail the roles of the emergency services, local authorities and other external organisations in the event of a major accident including the arrangements established to help with the emergency response on-site

1.2.2 The objectives of this plan are to

- *Containing and controlling incidents so as to minimise the consequences, and to limit damage to human health, the environment and property;*

¹ Reg 2 COMAH Regs 2015

² Reg 11 COMAH Regs 2015

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- *Implementing the necessary measures to protect human health and the environment from the consequences of major accidents;*
- *Communicating the necessary information to the public, and to the services or authorities concerned in that area;*
- *Providing for the restoration and clean-up of the environment following a major accident*

1.3 On-site and off-site definitions;

1.3.1 An '**on-site Incident**' is defined as "any hazardous condition, which is wholly confined in its effect, within the perimeter fence of the establishment"

1.3.2 An '**off-site' COMAH Emergency**' is defined as "any hazardous condition which results in, or is likely to result in, any immediate measures that need to be taken for warning and informing the public or business neighbours within or beyond the Public Information Zone

1.4 Site Contact Details

1.4.1 Routine / Non Emergency Contact Details (Site Operator):

International Flavours & Fragrances (GB) Limited, Duddery Hill Haverhill Suffolk,
CB9 8LG

Mr Nick Cutterham , Compliance Manager

Email: Nick.Cutterham@IFF.com

Tel: 01440 715120

Health & Safety Manager

Email:

Tel:

1.4.2 Emergency Contact Details

Security (Main Gate Security lodge)	24/7	01440 715000
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1.5. Site Information

1.5.1 IFF Haverhill covers some 40 acres. Its main manufacturing operation is that of fragrance compounds ingredients and flavours which are created using a variety of organic chemical processes. There are two divisions in the manufacturing process; Fragrance ingredients which runs 24/7 and Flavours which runs 24/7 (Monday - Friday). Bulk production activity involving tier 1 COMAH listed substances & shifts patterns typically run 24/7

1.5.2 Plant Shut Down Time

All processes, including the chemical processes will cease until the emergency has been dealt with.

1.5.3 Staff personnel

The total number of staff employed by IFF is 260, 80 of which are employed in the Fragrance Ingredients Division.

The table below gives an example of the total number of staff that may be on-site at any one time

1400 hrs (weekday)	0200 hrs
230*	15

*Includes Visitors /Contractors

1.5.4 Key Grid References

- Main Entrance (accessed from Duddery Hill) TL 6685 4490
- What Three Words jazz married vans
- Moon Hall Lane Gate TL 6699 4449
- What Three Words career angry metals

Site plan - See maps and aerial photos as detailed at [APPENDICES 1- 6](#)

1.5.5 Site Access and Egress

There are two access points for vehicles to the site which are as above.

These are also the main pedestrian accesses. In the case of the Moon Hall Lane a set of bolt croppers are located there should evacuation be required whilst the gates are locked

1.5.6 Public Rights of Way:

A public footpath runs north to south from Oxford Road to Homefield Road approximately 280m SW from the site.

2 **Risk**

2.1 Suffolk Community Risk Register

2.1.1 The Suffolk Community Risk Register for Suffolk has assessed industrial activity for IFF for toxic and chemical release as MEDIUM RISK and fires and explosions as MEDIUM RISK

2.1.2 As part of the COMAH Site Safety Report IFF has identified 11³ major accident scenarios. It is from these scenarios that the External and Internal emergency plans are developed and revised against.

2.1.3 The Health & Safety Executive has assessed the site hazards at IFF and identified an area described as the Public Information Zone (PIZ) (see [APPENDIX 1](#)) as one in which persons and or the environment are liable to being immediately affected by a major accident occurring at the establishment.

However, other scenarios considered less likely may arise involving other raw materials and combined by products which affect the public or the environment for longer periods of time and or greater distances. These additional risks can be found in the site safety report which has been submitted to the Competent Authority by the site operator. This information can be supplied by the site representative at the various multi-agency command points.

2.1.4 The site operator is responsible for the provision of information to the public, including business premises, within the PIZ⁴ in accordance with and Regulation 17 &18 of COMAH. The details of the information provided to the public within the IFF (GB) PIZ is at [APPENDIX 10 & 11](#). These were last distributed in March 2018

³ IFF Safety Report 2015 Section 12.1

⁴ Reg 18 COMAH Regs 2015

2.2 Domino Sites,

- There are no domino sites.

2.3 Wind direction.

The prevailing wind direction for the site is from the south west. Average wind speeds range between 3-6 m/s. The site has a weather station situated on the top of the front security building which collects up to date information on wind speed, direction, air temperature and pressure.

2.4 Primary risks to the public.

2.4.1 The IFF major accident scenarios consider the impacts of fire, fire and explosion, chemical fires and or explosion, and toxic releases.

2.4.2 A fire involving a mixture of chemicals may produce large amounts of smoke and or vapours which may be hazardous to health and or the environment due to the by-products of combustion. A fire or an explosion, may lead to additional hazardous particulates in any smoke plume. [APPENDIX 9](#) details the hazard impacts associated with these risks.

2.5 Primary Risk to the Environment

2.5.1 IFF site risks to the environment are determined under the Major Accident to the Environment (MATTE) definitions. These assessments consider the impacts of fire, fire and explosion, chemical fires and or explosion, and toxic releases.

2.5.2 **Those substances classified as dangerous to the environment**

2.5.3 The site is assessed as by the environment agency as a Source Protection Zone 1 (i.e. pollutants permeating into the ground water could contaminate the public water supply within 50 days)

2.5.4 Environmental risks are determined as chemical spillages, by-products of combustion, and by products of firefighting activity. Vectors for transmission are airborne particulates, surface water run-off, and drainage into surrounding land, and, contaminated equipment and or personnel.

2.5.5 The nearest watercourse to the site is the Stour Brook which is approximately 750 m from the IFF production area and forms the southern boundary to the site. The Brook flows into the River Stour approximately 4 km east of the site [APPENDIX 7](#) gives further details of the population vulnerable areas that may be affected by a MATTE.

2.6 On site resources and mitigation

2.6.1 The site maintains a fire crew minimum of 4 personnel during the working week (0800 hrs – 1700 hrs Monday - Thursday and 0800 hrs – 1600 hrs Friday). All staff are trained to identify and report any hazardous situation.

2.6.2 On-site Firefighting resources: Water is drawn initially from the Haverhill Town water supply via a 6-inch water pipe. Additionally, the fire pumps on-site are able to hold and supply 2 hrs water supply. Should it be necessary additional water can be obtained from the ponds situated on the southern boundary of the site. There is also a deluge system that covers the bulk storage and unloading areas of extremely flammable substances

2.6.3 On-site Medical Facilities: A number of staff (including the 24 hr security officers) are qualified First Aiders. Although there is a medical room on site this is used by the occupational nurse who would not provide emergency treatment.

2.7 On-Site containment– Spillages, surface water and effluent

2.7.1 Site assessments consider loss of containment retainable within the site boundary. Hazardous liquids are stored in bulk tanks (primary containment), which are located in bunds (secondary containment), which provide protection in the event of leakage from any of the tanks (Bunding on site is set at 110% of the maximum holding for each tank). Kerbing (leading to interceptor drainage and holding tanks) across the site has been so designed to provide a third area (Tertiary) containment.

2.7.2 The tertiary containment area is also designed to collect fire water run-off, which would then be pumped to an interceptor for off-site disposal by road tanker.

2.7.3 In all plant areas, pump bays, roadways and hard standing areas spillage, washings and rainwater are collected and directed via pumps and drains to the site low point where it is then pumped to an effluent treatment plant for collection and disposal.

2.7.4 The site operates tanker unloading areas. Tertiary containment for bulk delivery transfers within these areas is provided by bunds.

2.7.5 Storm water, spillage and deluge water from the highly flammable liquid tankers offloading areas are directed via underground drains and pumps to a fire deluge pit.

2.7.6 There is a site Emergency Response Team trained to intervene in the event of a spillage occurring. An Incident Controller would attend the scene. First aid spillage containment; employment of absorbents and or pumped to a road tanker or Intermediate Bulk Container, for disposal off-site would also be employed.

2.7.7 Any hazardous product release into the watercourse will require abstraction to stop until such time as water can be assessed and / or the river is cleaned.

2.7.8 The IFF site is separated from the Stour Brook by 750 m of land a large proportion of which contains domestic dwelling and metalled roads. The site itself is fully-bunded and all ground is concrete. It has been assumed that as a result of this that any contaminated water would not cause a MATTE. (However, in a worst-case scenario due to the water containment not being able to hold firewater then in some circumstances a MATTE could occur to the aquatic environment in the Stour Brook).

3. **Activation, Warning and Informing**

3.1 **Activation of the External Emergency Plan**

The External Emergency plan will be automatically activated when an Off-Site COMAH Emergency has been declared in accordance with the criteria defined at [1.3.2](#).

Once the site operator declares an Off-Site COMAH Emergency this will automatically be declared as a Major Incident for responding agencies.

The diagram at 3.4.14 below gives an overview of the alerting / notification process.

The following have the authority to declare an Off-Site COMAH Emergency and will activate this plan

The Site Operator or Emergency Services Incident Commander will declare an Off-Site COMAH Emergency and activate this plan under the direction of one of the following:

- Site Operator
- IFF Emergency Controller / Fire Team Leader
- IFF Site Emergency Team
- First Emergency Services responder in attendance
- Emergency Services Incident Commander
- Local Authority Duty Officer (JEPU)

Additionally, the emergency services may activate elements of this plan on the declaration of an on-site incident.

3.2 **Command and Control**

3.2.1 The initial site response will be as directed by the IFF Emergency Controller supported by the Site Emergency Team.

3.2.2 The on-site response will be supported by the Emergency Services until such time as they deem it appropriate to assume overall command of the emergency response.

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Thereafter, the IFF emergency capability to support the incident will be as directed by the Emergency Services Incident Commander.

3.2.3 The on-site Emergency Control Centre is located at the security office by the main entrance, the alternative being located at the on-site canteen. (This is the main command and control for on-site incidents only).

3.2.4 Command and Control of the off-site response will be in accordance with [the Suffolk Resilience Forum Generic Emergency Response Plan](#), i.e. Strategic Coordinating Group (StratCC at Suffolk Police HQ, usually chaired by the Police), Tactical Coordinating Group (located at Landmark House Ipswich and usually chaired by Police), and Incident Commander at the scene (Forward Control Point).

3.2.5 It is the aspiration of the local Suffolk responders to hold the first Strategic Coordination Group meeting within an hour and a half of the Off-Site COMAH Emergency being declared.

3.2.6 Specific arrangements for the Strategic Coordination Groups can be found in the [Suffolk Resilience Forum Generic Emergency Response Plan](#), Annex C.

3.2.7 The Strategic Coordination Group where appropriate will consider cross border notification.

3.2.8 Communications between the responding Suffolk Resilience Forum partners will be Airwave radio (Interoperability channels) where available, teleconferencing, Resilience Direct (See SRF Telecommunication and ICT Plan)

3.2.9 Contact details for all Suffolk Resilience partners and other agencies can be found in the Suffolk Resilience Forum Alerting Directory.

3.2.10 IFF Liaison Officers will attend each of these functions to support the command and control process

3.3 IFF Plant Site Alarm Systems and personnel reactions

3.3.1 The site is constantly monitored for hazards by automatic sensors and alarms, and the Main Security Office using CCTV.

3.3.2 Incident Alarm - All personnel on-site have a responsibility to raise the alarm by using the manual break glass alarm system for any fire, chemical spill or injury or otherwise dialing extension 5222 to alert security.

3.3.3 The incident alarm can also be activated automatically by either a pressure drop in any of the sprinkler systems due to activation by heat, the detection of heat by a fusible link break or smoke detectors

3.4 Method of alerting the Emergency Services – see [Diagram at 3.4.14](#)

3.4.1 A break glass alarm automatically activates an internal communications network alerting all IFF emergency responders (duty fire office, retained fire and rescue crews, Site Emergency Team, technical officers and first aiders).

3.4.2 The IFF Emergency Controller will ensure that a 999 call has been made to The Combined Fire Control and provide a summary assessment of the incident details and indicate if known, whether this is an on-site or off-site incident. Additional to that assessment, the Emergency Controller will also advise of the initial support to contain the incident and request the appropriate Suffolk Fire and Rescue Service pre-determined attendance for a Fire, Chemical Fire or Chemical Spillage.

3.4.3 The IFF Emergency Controller will ensure that incident update details are provided to the Combined Fire Control, including any relevant firefighting technical and or environmental information as known for the products involved in the incident (e.g. 'Instructions in writing' details for either specific product or assessed hazards) until such time as Suffolk Fire and Rescue Service are in attendance, and that information can be passed directly to the Suffolk Fire and Rescue Service Incident Commander in order to ensure the appropriate responses can be set in train.

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3.4.4 The assessments of the incident nature, scale or casualties being reported should use a suitably consistent reporting format using the METHANE mnemonic as used by the Emergency Services which is essential to enable the appropriate responses to be made.

[APPENDIX 13](#).

3.4.5 The main security office on receipt of an alarm panel indication, or as otherwise notified, will initiate a site shut down and broadcast the nature and location of the incident over the Tannoy system.

3.4.6 Emergency Services' Rendezvous points (RVP) will be identified by the first emergency service that arrives on-site in consultation with the site security staff. It is important that this location is in a safe location taking into account the prevailing wind conditions and nature of the incident.

3.4.7 The Forward Control Point (FCP), if not one of the designated RVP locations, (Para 3.4.8) must be an area where non intrinsically safe communications may be used by all responding agencies, large enough to be accessible safely by multi-agency vehicles staff, and freely accessible. This location will normally be identified by the Suffolk Fire and Rescue Service Incident Commander. It is important that once identified all other emergency responders are aware of the location. (The initial FCP can be relocated on with the agreement of all agencies if felt appropriate)

NOTE: The use of airwaves radios on site should be a multi-agency agreement based on benefit/risk decision made in consultation with the site operator

3.4.8 The Designated RVPs are

- RVP 1
- RVP 2
- RVP 3
- RVP 4
- RVP 5

3.4.9 Suffolk Fire and Rescue Service will support an Off-site COMAH Emergency with the provision of two Command Vehicles to coordinate the emergency firefighting response on site and provide the Forward Control Point location for the multi-agency operational response activity to take place. One Command Vehicle will be located at the multi-agency Forward Control Point. The other may be at the incident scene or removed to an appropriate location at the discretion of the Fire Incident Commander. It should be noted that the provision of the command vehicles will take some time.

3.4.10 Traffic Control Points (TCP)

- TCP1
- TCP2
- TCP3
- TCP4
- TCP5
- TCP6

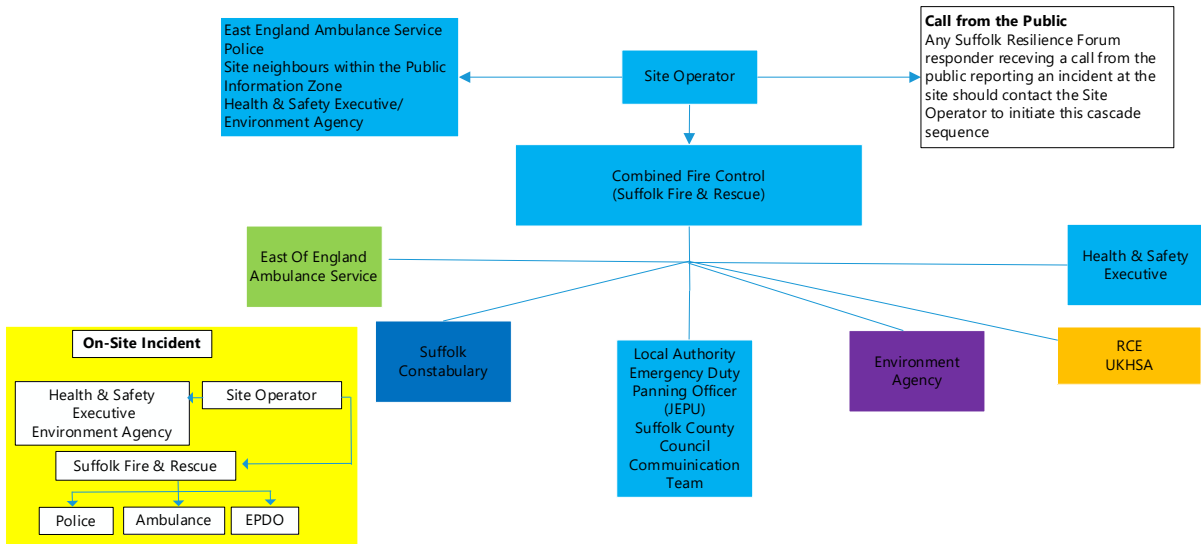
3.4.11 Evacuation Assembly Points (EAP)

3.4.12 Pedestrian Emergency Exit Points

3.4.13 Helicopter landing zones

None designated.

3.4.14 Overview of alerting and notification process.



Suffolk Fire & Rescue	Suffolk Constabulary	East of England Ambulance Service	Emergency Planning Duty Officer & Suffolk CC Comms	Environment Agency	RCE UKHSA
Pre Determined Attendance Suffolk Constabulary Ambulance Service Emergency Duty Planning Officer EA HSE SCC Comms RCE UKHSA	Internal Health & Safety Suffolk CC Highways Local Insp / Sgt Duty Press Officer Duty Superintendent* Resource Management Neighbouring Forces NPoCC * On call Supt will initialise call out to setup a command structure	HART UKHSA RCE NHS England CCG's Local NHS Hospital Trust	District / Borough Local Authority Management Team Environmental Health Emergency Planning Officers Communication Team ----- Suffolk CC Communication Team Growth Highways and Infrastructure (GS&I) JEPU Resilience Team (RED)	Food Standards Agency Water Companies DEFRA Agricultural Abstractions HSE Natural England Suffolk Wildlife Trust	UKHSA – East of England

3.5 Method of Warning Workforce

3.5.1 The site emergency alarm is a continuous ringing bell for a prolonged period.

3.5.2 In both automatic and manual activation the basic details of the alarm such as the location of the incident will be displayed on a digital readout on each of the ZP3 fire alarm panels that are situated throughout the site.

3.5.3 On the activation of the site alarm all staff are required to immediately evacuate their buildings/areas and go to the nearest roll call assembly point.

3.5.4 The Site security office, on activation of the alarm will contact the commercial neighbours immediately adjacent to the site ([3.6.4](#) refers) of the incident details, and confirm it is an on incident or likely to escalate to a COMAH off-site Emergency.

3.5.5 At the alarm activation designated roll callers will attend the security office and obtain the “Tensor” register which is automatically printed out in the Security Office (Fragrance staff and visitors). The Flavours register is automatically printed off in the finished goods warehouse / stationary room. The duty roll caller is then responsible for ensuring that all staff and visitors are accounted and updating the Emergency Control Centre. (If the initial assembly point is comprised due to the incident, staff will be redirected to alternative assembly points which will be identified by the Emergency Control Centre).

3.6 Off-Site Notification

3.6.1 The site operator is responsible for providing prior notification of any potential major accident hazard to those residents and premises within the Public Information Zone. [APPENDICES 10 & 11](#) refers – Off-Site Notification Letter and Off-Site Action Card) which set out the public reactions on hearing the COMAH Alarm. These letters were last distributed in March 2012

3.6.2 The COMAH alarm is the site fire alarm, which can be heard (subject to the prevailing wind) throughout the Public Information Zone and further afield.

3.6.3 The activation of the COMAH alarm is as directed by the personnel at [3.1](#)

3.6.4 The Main Security Office, on activation of the COMAH Alarm will advise the commercial neighbours immediately adjacent to the site.

3.6.5 Whilst traffic control points and pedestrian access routes have been identified (para [3.4.10](#) & [3.4.12](#) refers) to manage access and egress around the site, coordination and management of cordons and access routes will be as directed by Suffolk Fire and Rescue Service and Suffolk Police in order to prevent and minimise public exposure to any consequential effects of an incident occurring on-site.

3.6.6 The initial advice to all persons within the Public Information Zone is to turn off / douse any naked lights outside their premises, 'Go in' - close all doors, windows and forced air ventilation, 'Stay in' - until further notice and 'Tune in' - to local radio for further information as per the off-site letter.

3.6.7 Once wind direction is confirmed, priority notification to the public will be based on the area affected taking into account the estimated plume width (Chemical and Metrological modelling – CHEMET) as requested by Suffolk Fire and Rescue Service. This is also available to Emergency Planning Officers on the Meteorological Office Hazard Manager Service).

3.6.8 If the assessed off-site hazards within the Public Information Zone are such that evacuation is preferable to shelter, this will be led by the Police. It is unlikely the latter advice is given within the first hour of the incident. If required rest centre locations will be identified and staffed by West Suffolk Council.

3.6.9 Escalation of the incident may require wider areas to be considered for evacuation.

3.6.10 Immediately post incident, all participating agencies will use the processes above to advise the public that the incident has been brought under control.

3.6.11 The media response during and after an Off-Site COMAH Emergency is described in section 4 below.

4. **Media Arrangements**

4.1 On notification of an Off-Site COMAH Emergency the Combined Fire Control will alert Suffolk County Communications that an incident is taking place. Suffolk County Council Communications will advise the locally elected members for the Suffolk County Council Divisions. West Suffolk Communications will advise the locally elected members for West Suffolk Council and will also update Haverhill Town Council

A media Action Card is provided at [APPENDIX 14](#)

4.2 The Strategic Coordinating Group (Media Coordination cell) will determine how information to the public will be disseminated to provide ongoing advice to those persons and vulnerable groups both within (and if necessary outside) the Public Information Zone⁵. All media responses to an off-site incident will be in accordance with the [SRF Communication Plan](#)

4.3 The following agencies are able to offer specific advice as follows:-

- The Environment Agency / UKHSA will advise regards any outstanding issues to Air quality
- The Environment Agency will advise with regards to any incident resulting in pollution of the environment.
- UKHSA will advise regarding health impacts and advice
- Food Standards Agency will advise regards any outstanding issues to environmental health aspects regards locally produced foods, either for domestic or commercially consumption.
- The Local Authority Environmental Health or the Environment Agency will advise regards contaminated land issues.

⁵ Reg 26(5) COMAH Regs 2015

5 Roles & Responsibilities

The [SRF Generic Emergency Response Plan](#) identifies main roles and responsibilities of responding agencies. Those listed below are site specific for this plan.

5.1 Site operator

- Declare Off-Site COMAH Emergency, inform Combined Fire Control (999)
- Activate Emergency teams and Main Control Room
- Assess situation, identify substances and potential volumes involved, collate information, continue to advise emergency services and maintain log.
- Determine wind direction and advise emergency services of appropriate RVP
- Alert workforce.
- Alert off-site neighbouring premises, commercial sites, residential properties etc as required by External Emergency Plan PIZ.
- Provide liaison officer to Emergency Services RVP with access to Safety Data Sheets, 'UN / Trem card' details for transported substances, to support emergency responders and other agencies requiring technical information.
- Provide Technical Liaison Officer (Senior Manager) to SCG
- Provide Technical Liaison Officer (Senior Manager) to TCG
- Call in appropriate management staff.
- Provide media representative at the forward Media Liaison Point as set up by Police and provide liaison with the Multi-Agency Strategic Co-ordinating Group (SCG) if established otherwise TCG.
- Notify HSE & EA of incident.
- Advise, as briefed by Fire / Police, neighbouring premises, commercial properties residential properties etc. when safe to return to place of work / residences.
- Liaise with Environment Agency post incident for recovery of site and mitigation of on- and off-site environmental consequences.

5.2 Fire & Rescue Service

- Activate the International Flavours and Fragrances (IFF) Major Incident Plan and consult Operational Risk Information Fire Wallet.
- Despatch officer to Emergency Services RVP.

5.3 Suffolk Constabulary

- Activate emergency Plan International Flavours and Fragrances
- Establish a command structure
- Assist with the multi-agency response to traffic management in the event that there are road closures.
- Facilitate information sharing via an Airwave interoperable talk group.
- Participate in a multi-agency media plan.
- Dispatch an officer to the Emergency Services RVP

5.4 Ambulance service

- Despatch officer to Emergency Services RVP
- Mobilise on call NILO to RVP
- Confirm on-site facilities for casualty management and decontamination etc.
- Inform NHS England, UKHSA, Chemical Radiological and Environmental Hazards (RCE) If Major Incident is declared notify neighbouring Ambulance Services
- Notify UKHSA
- Deploy HART Team

5.5 Clinical Commissioning Group (CCG)

- Source NHS support to Local Authority emergency reception centres as appropriate
- Liaise with Local Authority and Police regarding vulnerable persons

5.6 UKHSA

Contact emergency responders to ascertain details of the incident

- Undertake public health risk assessments
- Undertake exposure assessments
- When appropriate, convene a Science and Technical Advice Cell (STAC)
- When appropriate, the Environment Agency and UKHSA will convene an Air Quality Cell (AQC)
- Provide information and public health advice direct to emergency responders and multi-agency groups (e.g. about the toxic effects of released chemicals, protective actions to be taken to protect health, health surveillance, and the need for a major incident health register)
- Provide public health advice to the Fire and Rescue Service's Incident Commander regarding the use of a 'controlled burn'
- Advise emergency responders on the health considerations of response decisions (e.g. evacuation versus sheltering decisions)
- Provide health messages for multi-agency media statements
- Provide information to GPs, hospital staff and public health staff based in Local Authorities via DPH and CCGs
- Provide public health advice in the recovery phase of an incident

5.7 Environment Agency

- Activate the Air Quality Cell via the 24/7 National Air Quality Technical Advisor (NAQTA).
- Via the Air Quality Cell, consider and advise on the risk to the environment from air quality.
- Lead on water pollution incidents from land based sources.
- Support mitigation and containment through deployment of EA pollution control equipment where safe to do so.
- To investigate, sample and collect evidence where safe to do so for analysis, future enforcement and cost recovery.
- Attend the multi-agency response at FCP, TCG & SCG etc. as appropriate.
- Advise on environmental impacts to SCG via STAC, and COBR via SAGE.
- Warn water abstractors so they can take appropriate action.
- To provide specialist advice on waste management, environmental pollution and hazardous sites, including during recovery and clean-up.
- To provide warnings of flooding via the Floodline Warnings Direct system to professional partners, media, business and the community.
- Maintain and operate flood defences on certain specified rivers and coastlines.
- Participate in coordinated media engagement where appropriate, can assist with media messages and would offer the assistance of communications experts to any media cell.

5.8 National Highways

- Through the managing agent contractor provide ongoing support to traffic management including public information and shrinkage
- Through the managing agent contractor provide and maintain temporary or permanent road closures
- Initiate the variable matrix signs situated on the A14 and approach roads advising motorists of the incident.
- Through the managing agent contractor repair and, where able, improve roads and infrastructure.

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- Clear debris from those roads and other places for which National Highways has responsibility.
- Support the management of the day-to-day operation of the network (by Eastern Region Operations Centre and mobile patrols within the affected area, including minor improvements, congestion relief, encouragement of alternative travel modes and reviewing the adequacy of the current network and planning for the future)

5.8 Anglian Water / Essex & Suffolk Water

- Activate relevant Emergency Plan`

5.9 Local Authority

Suffolk County Council

- Activate Joint Emergency Response Plan. – Parts 2-10 and Part 4
- Provide public health support for STAC

West Suffolk Council:

- Activate Joint Emergency Response Plan. – Parts 2-10 and Part 4

5.10 Food Standards Agency

- Advise Public on food safety matters
- Testing sampling and analysis of areas affected by hazardous substances

5.11 Health and Safety Executive

- Investigate cause and the emergency response arrangements and take appropriate action

6. Recovery

6.1 Overview

Recovery is an integral part of the emergency management process and starts in the Response Phase, normally with the formation of a Recovery Coordination Group as a decision taken by the Strategic Co-ordinating Group (SCG). Local authorities may be handed the role of leading the multi-agency Recovery Phase relatively quickly, depending on the type of incident and its impact.

Inclusion of IFF in this process is vital to ensure the early restoration of normality is achieved.

This plan should be read in conjunction with the [SRF Recovery Plan](#). For the purposes of this plan, recovery is defined as:” *The process of rebuilding, restoring and rehabilitating the community following an emergency.*” (*“Emergency Response and Recovery”, HM Government*)

6.2 Environmental clean-up and restoration

The remedial measures should be proportional to the amount of harm caused by the accident, and to the likely level of continuing harm to people and the environment. The operator has a duty to take remedial measures to mitigate the effects of major accidents under regulation 5 of COMAH and under other environmental legislation such as the Water Resources Act 1991 and the Wildlife and Countryside Act 1981.

Environmental Recovery issues

- Removal of debris and cleansing of effected area
- Segregation and containment of waste products and cleansing of effected area
- Segregation and containment of contaminated water
- Removing, cleaning and or replacing contaminated soil
- Identifying restrictions on foodstuffs (commercial or domestic)
- Restricting access to contaminated areas (agricultural or commercial usage)
- Removal of dead animals

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- Restocking watercourses, lakes.
- Remedial action on surface and groundwater supplies.
- Restoration of vegetation, habitats and re-introduction of animal and plant species
- Using qualified appropriately accredited / registered and licensed disposal contractors

7. Review and Exercising of Emergency Plans

7.1 The Review and Testing of the External Emergency plan (in accordance with COMAH Regulations) shall be undertaken at periods of no greater than 3 years

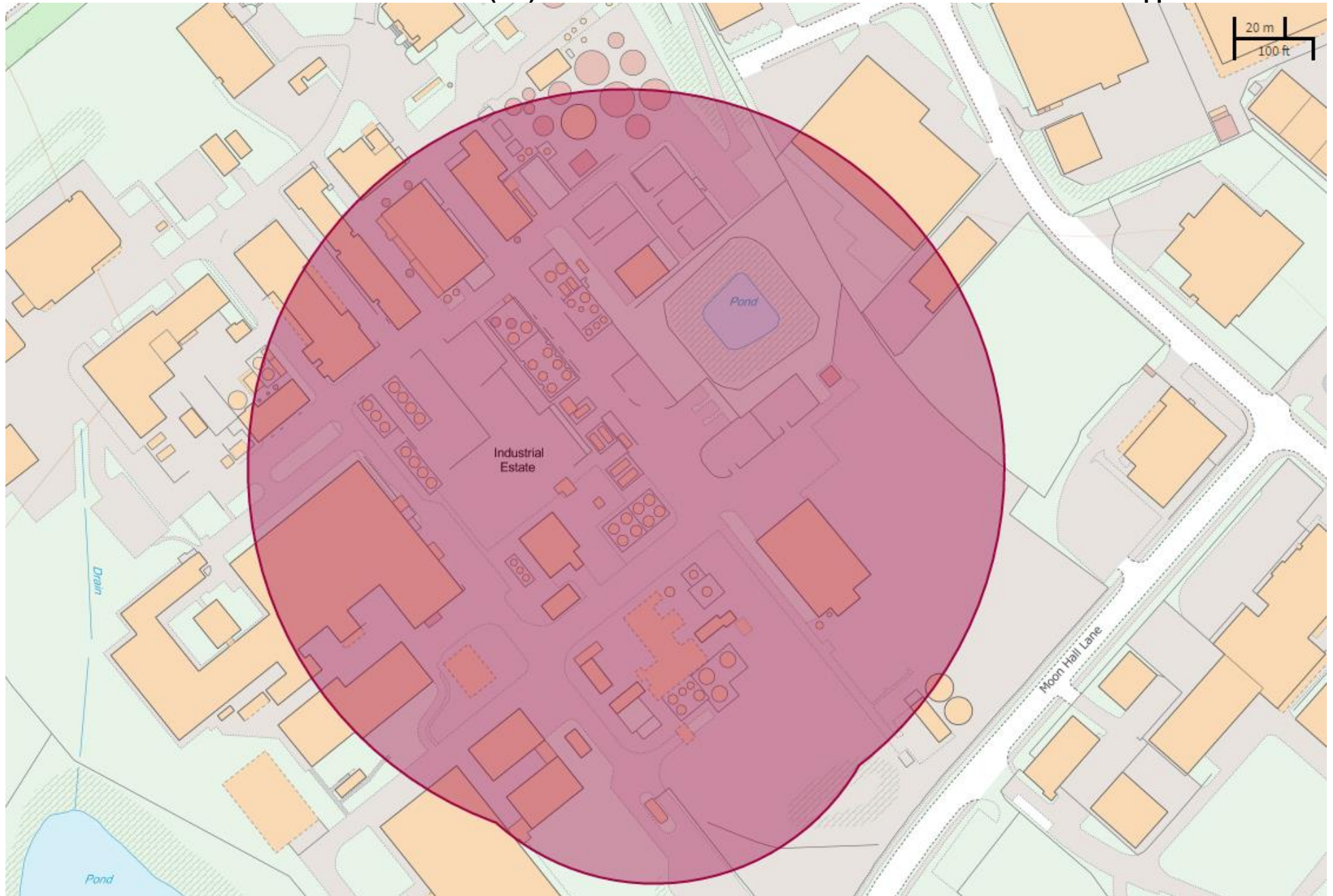
- Arrangements to test the plan to such extent as is necessary are undertaken by the Multi-agency partnership of the Suffolk Resilience Forum.
- Any such review and revision of the plan shall take into account any changes reflected in; legislation or guidance, operating procedures and processes or changes to upper and lower tier status of materials held or processed on-site by IFF, new technical knowledge and knowledge concerning the response to major accidents.

7.2 Page vii (Exercise Log) details the date, type of exercise and any pertinent comments and should be completed each time this plan is exercised or reviewed.

7.3 The arrangements, commensurate with the COMAH Regulations and Guidance, for exercise planning are detailed within the Suffolk Resilience Forum Protocol for Multi-Agency Exercise Planning for Suffolk.

Appendices:

1. IFF (GB) – HSE Public Information Zone
2. IFF (GB) – **Map of RVP and Associated Forward Control Point Locations**
3. IFF (GB) – **Map of Traffic Control Points**
4. IFF (GB) – **Site Plan**
5. IFF (GB) - **Drainage Plan**
6. IFF (GB) – **Aerial Photograph of Site**
7. At Risk Populations and Areas
8. Local Infrastructure and Industrial Activities
9. **IFF (GB) – Listed Materials and Hazard Data**
10. Information to the Public within the PIZ: Contents of off-site warning letter
11. Information to the Public in the PIZ: Off-Site Action Card
12. Consultation details
13. METHANE
14. Media Action Card



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IFF (GB) Traffic Control Points

Appendix 3

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IFF (GB) Site Plan

Appendix 4

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At Risk Populations and Areas

Appendix 7

Commercial sites:	Relation to site (N E W S)	In Public Information Zone	Day Shift	Night Shift
IFF Site	N/a	Yes	300	15
Bradnam's Joinery - 01440 761404	NE	Yes	80	Nil
Cornelius Specialties – 01440 713608	NE	Yes	20	Nil

Residential areas	Estimated Populations	Relation to site (N E W S)	In Public Information Zone	Distance from site (km)
Clements Estate	500	N	Partially	0.2 – 2.0
Haverhill Town Centre	5000+	NE	No	0.7

Schools < 2.4km	Address	Relation to site (N E W S)	Distance from site (km)	Number of pupils
Burton End Primary Academy	School Lane , CB9 9DE	NW	1.7	390
Cangle Community Primary	Chapple Drive CB9 0DU	N	2.4	203
Clements Primary	Greenfields Way CB9 8NJ	NW	0.6	236
Place Farm Primary Academy	Camps Road CB9 8HF	NE	1.1	Max 420
St Felix RCVP	School Lane CB9 9DE	NW	1.9	295
Westfield Primary Academy	Chalkstone Way CB9 0BW	NE	1.6	420
Castle Manor Academy	Eastern Avenue CB9 9JE	N	1.2	644
Samuel Ward Academy	Chalkstone Way CB9 0LD	NE	2	1281

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Transient Populations	Postcode	Relation to site (N E W S)	Distance from site (km) (IMP / E plant)	Potential no's
Tesco's	CB9 0BQ	NW	2.8	100+
Sainsbury's	CB9 7YL	NW	2.1	100+
Haverhill Arts Centre	CB9 8AR	NE	0.9	30+
Haverhill Sports Centre	CB9 0ER	NE	1.1	50+
Cineworld	CB9 0ER	NE	1.1	50+

Residential Homes	Postcode	Relation to site (N E W S)	Distance from site (km) (IMP / E plant)	Potential no's
Sherman Court Mill Road (Shelter Accommodation	CB9 9DE	NE	0.9	300+
William Blake Court Cambridge Close (Sheltered Accommodation	CB9 9HR	N	2	56+
Weavers Court Millfied Way Sheltered Accommodation	CB9 0DX	NE	1.9	60+
Cleves Place Millfied Way	CB9 0JB	NE	1.9	120+
Hanover Housing Hawke Close	CB9 0JF	NE	1.9	72+
Haverhill Wellbeing community Day Care Centre Camps Road	CB9 8HF	NE	1.1	30+

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Environmentally Sensitive Locations < 1km of the site ⁶	Nil - 250m from site	251 - 500m from site	501 - 1000m from site
1:250,000 Solid Geology			
Borehole Index	2	-	3
Areas of Outstanding Natural Beauty	-	-	-
National Parks			
National Nature Reserves			
Abstractions Licenses	-	-	
River Quality Survey			
RAMSAR Sites (Wetlands of international Importance)	-	-	-
Sites of Special Scientific Interest (SSSI)	-	-	-
Special Areas of Conservation(SAC)			
Special Protection Areas	-	-	-
Groundwater Vulnerability	-	-	-
Environmentally Sensitive Areas	-	-	-

Local infrastructure.

- The town of Haverhill (population 22,276) and is situated in the south west of Suffolk on the borders with Essex and Cambridgeshire. It is approximately 22.5 kms south east of Cambridge and 30 kms south west of Bury St Edmunds
- The IFF site is immediately bordered by residential housing and industrial premises.
- The Clements housing estate is situated within 300 m of the site and has approximately 5000 residents
- The site is situated in the south of Haverhill and access to it is via the A1017 or through the centre of Haverhill
- There are no rail links to Haverhill or major arterial road networks.
- UK Power networks have an overhead electrical power line which crosses the underdeveloped part of the site
- There is an underground natural gas pipeline which crosses the north and west of the undeveloped site
- There is no assessed usage of the land beneath the site that could contribute to a major accident on the site.
- There are no agricultural sites within the vicinity of the site. However there is an allotment site situated 300 m north east of the site
- The only Grade I listed building within 3kms of the site is the St Mary the Virgin Church, Church Walk (2,500 m south east of the site)
- There is an Anglian Water sewage works and water treatment plant serving Haverhill situated 1,200 m to the east of the site

Local environment

- The site sits on a mixture of chalky boulder clay. Although the site does sit above a chalk aquifer it is considered to be hydraulically isolated from the site due to the substantial thickness of glacial till or boulder clay.
- There are 9 sites defined as a Site of Special Scientific Interest (SSSI), within 10 km radius of the site. These are all wood areas situated in Cambridgeshire and Essex. (See table below)

Name	Location	Distance from and relation to the site
Trundley & Wadgells Woods	Great Thurlow Suffolk	7 kms N
Over & Lawn Woods	Cambridgeshire	8 kms NW
Langley Woods	Castle Camps Cambridgeshire	8.5 kms SW
Balsham Wood	Balsham Cambridgeshire	10 kms NW
Out & Plunder Wood	Calton Cambridgeshire	10 kms N
Park Wood	Brinkley Cambridgeshire	10 kms N
Ashdon Meadows	Ashdon Essex	10 kms W
Hales & Shadwell Wood	Ashdon Essex	10 kms SW

- The nearest Special Area of Conservation site is The Devils Dyke which is approximately 20 km from IFF
- The only local nature reserve is the Haverhill Railway Walk Nature reserve.
- The nearest watercourse to the site is the Stour Brook which is approximately 750 m from the IFF production area and forms the southern boundary to the site. The Brook flows into the river Stour approximately 4 km east of the site
- There are a total of 7 water abstraction points within 5 kms of the site

Industrial Activity

- The main industrial activity of IFF is split into two divisions namely Fragrances and Flavours. Both these activities are contained within the boundary of the site. Additionally there are bulk storage tanks and warehousing for raw materials situated on the site.
- The Flavours manufacturing operations run 24 hrs a day 5 days a week and there is no operation taking place on Bank Holidays and throughout the Christmas and New Year holiday period
- The Fragrance Ingredients support services such as administration, maintenance goods in and dispatch operates 5 days per week. Occasionally, goods deliveries or maintenance takes place outside these hours. The manufacturing operation runs 24/7 and only stops for maintenance or other planned shutdowns.”
- The raw material, processing material and finished products held on site that qualify as COMAH Top Tier substances; include toxic, flammable and dangerous to the Environment substances see [APPENDIX 9](#). IFF stores raw materials for its production demands in bulk storage tanks. Finished goods are stored within the warehouse facility. The areas where these good are stored are surrounded by bunds and water deluge systems. **The maximum quantities held on site are**
- .
- The site operates water extraction from 2 boreholes under licence for its own operating processes, which include both industrial processes and domestic usage on site.

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COMAH Listed Materials on Site with Hazard Data

Appendix 9

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As Post Marked

Operations Manager
Bradnam Joinery Ltd
17 Rookwood Way
Haverhill
Suffolk
CB9 8PB

Dear Sir/Madam

Re: Off-Site Warning Letter

I am writing to you as the Operations Manager of International Flavours & Fragrances, I.F.F. (Great Britain) Limited, at Duddery Hill, Haverhill to make you aware of the proximity of your premises to our storage and processing facility for various bulk volumes of chemicals, in particular; Tertiary Amylene and Propylene Oxide.

Our plant has been processing and storing chemicals since 1957 and we are regulated by the Control of Major Accident Hazards Regulations 2015. The Health and Safety Executive (HSE) determined that we were required to notify and advise those persons whose property lies within 140 meters of our bulk storage tanks for those chemicals noted above and warn them of what actions to take in the event of an accidental release of those chemicals.

I would like to emphasise that I am writing to you as part of our COMAH 5 year review and not due to any basic changes in our production methods or increase in volumes of chemicals held to support these processes. This notice does not imply that the risk to yourselves is any greater, simply that the risk exists.

As an important member of the Haverhill Community, we have always given the safety of our neighbours and those working within our site the highest priority. We have every confidence in our facilities and procedures.

Following detailed discussions between the HSE, Emergency Services, the District Emergency Planning Officer for St Edmundsbury Borough Council and other partner organisations, comprehensive and detailed On Site and Off Site Emergency Plans have been developed which are designed to safeguard the general public and those commercial organisations that may be affected by our commercial activity and minimise the effects of a major accident on site.

The attached warning card gives you information about how we will contact you and inform you of an on-site incident and what you should do following that notification. Please read and inform your staff about its contents. Please ensure it is kept in a safe and accessible place should you need to refer to it in the future.

Finally, if you have any queries or concerns regarding this letter please do not hesitate to contact me at the above address.

Yours faithfully
International Flavours & Fragrances, I.F.F. (Great Britain) Limited

Stephen Dickens
Operations Manager

Note a similar letter was also sent to Cornelius Ltd which is the only other premises within the PIZ

International Flavours & Fragrances, I.F.F.
(Great Britain) Limited

MAJOR EMERGENCY SAFETY CARD



1. WARNING OF DANGER

Warning of an emergency will be given by a phone call from the IFF site. This will be accompanied by the sound of the alarm bells from the IFF site.

2. GO TO A SAFE PLACE

Proceed towards your designated assembly point and wait for further instructions.



3. MAKE THE PLACE SAFER

Shut all doors, windows and ventilation grilles. Keep well away from windows. DO NOT SMOKE. Extinguish naked flames and pilot lights.



DO NOT USE MOTOR VEHICLES UNLESS ADVISED BY THE EMERGENCY SERVICES THAT IT IS SAFE TO DO SO. A SPARK OR OTHER IGNITION SOURCE MAY CAUSE AN EXPLOSION.

4. FURTHER INFORMATION

Listen out for announcements from the emergency services for further instructions.

Listen to the local radio for official advice. (e.g. Police Messages): -

- HEART
- BBC Radio Suffolk



5. ALL CLEAR

Wait for the all clear from the emergency services and follow their instructions.

If you have any queries on this notification please contact 01440 715000

IFF

Consultees

- Suffolk Resilience Forum (multi-agency COMAH Off-Site Working Group partners for IFF (GB))
- IFF (GB)
- County, District and Parish Council Elected Members
 - County Council – Cangle, Haverhill East & Kedington Divisions
 - West Suffolk Council– Haverhill South, East, West & North Wards
 - Haverhill Town Council
- Businesses within the PIZ
 - Bradhams Joinery
 - Cornelius Specialities

METHANE

M ajor Incident	Major incident declared? (Include date & time of declaration)	
E xact Location	Exact location / geographic area of incident	
T ype of Incident	Flooding / Fire / Utility Failure / HazMat/ Disease outbreak etc.	
H azards	Present or suspected	
A ccess	Routes that are safe to use, any inaccessible routes and RVP's	
N umber of Casualties	Numbers, type and severity	
E mergency services	Present and those required	

MEDIA ACTION CARD

During an Off-Site COMAH Emergency Incident an International Flavours & Fragrances (GB) Limited Haverhill it is suggested that the following agencies communications departments are involved in developing the Media Strategy.

Reference should be made to the SRF Communications Plan

Holding statement

An incident at International Flavours & Fragrances (GB) Limited Duddery Hill Haverhill CB9 8LG, has been reported to the Emergency Services for Suffolk. As part of the response, the IFF COMAH External Emergency Plan has been activated. Residents within the Public Information Zone are advised to; Go in, Stay in and Tune in".

Agencies

Suffolk County Council will be the lead Communications department as Suffolk Fire & Rescue Service will be the lead agency.

It is suggested that the following agencies should be involved in the media and communication cell

International Flavours & Fragrances (GB) Limited

Environment Agency

Suffolk Constabulary

East of England Ambulance Service

West Suffolk Council

NHS England

UKHSA

West Suffolk Clinical Commissioning Group

Anglian Water