Appendix 10: Accident management plan

Purpose	▪ This plan assesses potential incidents or events that could result in pollution and/or not being able to comply with permit conditions, taking into account mitigation measures.
Scope	▪ This procedure covers all operational areas and includes activities under the control of the site environmental permit, and also those outside of the permitted areas but within the wider Mondelez Sheffield site.
Responsibilities	▪ Accountable – Plant Director, Sheffield ▪ Responsible – Site HSE Manager, Sheffield ▪ Informed – All site personnel
Site Permit number / Regulators	▪ Environmental Permit ref. no.: TBC (Environment Agency) ▪ Sheffield City Council, Environmental Health ▪ Yorkshire Water (trade effluent consent refs: 3390775, 3390785, 339008, 3390082)

Change control

Version 1.0 (March 2026)	▪ Initial version
Revisions	▪ *Revisions to be documented and principal changes summarised.*

1. Introduction

This document presents the Accident Management Plan for the Mondelez Sheffield site. This plan is established to identify, evaluate and prepare for potential incidents or events that could result in:

- Pollution; and / or
- not being able to comply with permit conditions.

This plan for accident prevention and management follows relevant Environment Agency guidance[1] and includes the following sections:

- Overview of management controls (Section 2)
- Identification of relevant sensitive receptors (Section 3).
- Identification of potentially polluting substances held on site (Section 4).
- Identification potential accidents and incidents and assessment of the overall risk posed by these hazards (Section 5).
- The overall risk of each of the hazard is identified qualitatively on the basis of the likelihood of the event occurring and the environmental consequence of that event, taking account of:
  - Preventive controls in place; and
  - Actions to be taken in the event of the accident / incident occurring.
- Summary of actions to be taken following an accident or incident occurring, including measures to record, investigate and respond to the incident (Section 6).
- List of emergency contacts (Section 7).

[1] www.gov.uk/guidance/develop-a-management-system-environmental-permits#accident-prevention-and-management-plan, accessed 29/9/25

2. Overview of relevant management controls and procedures

Mondelez has an established EMS, which forms part of a wider Health, Safety and Environmental (HSE) Management system. Corporate level management system processes are in place, which are supplemented by site-specific documented procedures and processes.

Mondelez has developed processes to identify, respond to and control emergency situations that may cause adverse environmental consequences. Spill kits are readily accessible at locations where there is a risk of spillage (e.g. delivery, storage and areas of use). Spill response training is provided to staff. This includes information about how to prevent and control pollution incidents from accidental spills of potentially polluting materials including product ingredients, oils, fuels and chemicals.

Contingency plans help minimise potential environmental impacts; this includes emergencies arising from breakdowns, enforced shutdowns, abnormal circumstances such as flooding as well as major fire and spill/loss of containment events.

Appropriate site security is provided including fencing/walls around the entire perimeter, automatic control systems for entrance gates, permanently monitored CCTV with recording facilities and security personnel on site 24 hour per day, 7 days per week.

3. Sensitive receptors

The site is located on the edge of a predominantly industrial / commercial area, beyond which lies a varies of land uses including residential and amenity areas. The River Don runs adjacent to, and also splits the site. To the east beyond the River Don is Parkwood Springs, a large area of natural land including woodland and heath.

A summary of sensitive receptors relevant to Mondelez Sheffield site is provided in Table 1 below.

Table 1: Sensitive receptors

Receptor type	Receptor description and distance
Residential housing	▪ North: Nearest residential properties located approximately 370 m to the north and 300 m to the northeast. ▪ East: Nearest residential properties, a traveller's site on Club Mill Road, is located approximately 120 m from the site. ▪ West: Nearest residential properties which front on to the main A61 trunk road located approximately 185 m from the site. ▪ South: Land use to the south is largely industrial and commercial, with nearest residential property located approximately 750 m from the site.
Public amenity areas	Owlerton stadium (greyhound racing) is located immediately to the south of the site, Hillsborough sports centre is located adjacent to the site to the West and Parkwood Springs open land area is located to the east. Hillsborough Park is located approximately 200 m to the west and Hillsborough Stadium (Sheffield Wednesday football club) is located 470 m to the northwest, on the far side of the A61 trunk road.
Schools	The nearest schools are located approximately 240 m to the east, 550 m to the northeast and 420 m to the west.
Hospitals / healthcare facilities	The nearest healthcare facilities are approximately 1km to the south and west of the site.
Industrial/commercial sites	The site is located in a predominantly industrial / commercial location with industrial sites in close proximity and bordering the site in all directions.
Habitat sites – statutory designations	The following European designated habitat sites have been identified approximately 7.5km to the west of the site (at the nearest point): ▪ South Pennine Moors SAC; and ▪ Peak District Moors SPA. There are three Sites of Special Scientific Interest (SSSIs) within 2km of the site, however these are all geological designations: ▪ Neepsend Railway Cutting SSSI; ▪ Neepsend Brickworks SSSI; and ▪ Wadsley Fossil Forest SSSI.
Habitat sites – non statutory designations	The following non-statutory designation habitat sites have been identified within 2km of the site: ▪ *Local Nature Reserves (LNR)* Roe Woods and Crabtree Ponds; Loxley and Wadsley Common.

Receptor type	Receptor description and distance
	▪ *Local Wildlife Sites (LWS)* Middle River Don: Hillsborough to City Centre; Wardsend Cemetery; Scraith Wood & Rawson Spring; Upper River Don: Deepcar to Hillsborough; Parkwood Springs; Malin Bridge to River Don; Oxspring Dam; Bagshaw Wood, Wadsley Bridge; Busk Meadow Woodland; Birley Edge & Back Edge; Wadsley Park (formerly Middlewood Hospital); Lower Rivelin Valley; Broadhead Dam to Malin Bridge; Roe Wood & Little Roe Wood; Norwood Allotments Woodlands; Walkley Bank Plantation; Loxley & Wadsley Commons; Blake Street Nature Park; Bole Hills, Walkley; Parson Cross Park; Crabtree Pond & Wood; Kelham Island; River Don (City Centre to Blackburn Meadows). ▪ *Ancient Woodland* Roe Wood; Beeley Wood West. ▪ *The River Don,* running through the site, is identified as a protected fish migratory route.
Ground / groundwater	Underlying groundwater classed as a Secondary A aquifer within superficial deposits and within bedrock geology; groundwater sensitivity is considered to be Moderately High; the installation is not located within a groundwater Source Protection Zone although there is an active groundwater abstraction located approximately 90 m to the west.
Surface water	The River Don splits the installation and a tributary of the River Don is present adjacent to the north eastern boundary. A culverted watercourse is present beneath the yard in the west of the installation, the culvert conveys water overflow from a pond located in Hillsborough Park approximately 300 m to the west. Surface water sensitivity is considered to be High. There is likely to be hydraulic continuity between underlying groundwater and the surface water features.
Atmosphere	Local, regional and global atmosphere. The site is located within Sheffield Citywide Air Quality Management Area (AQMA), which covers the entire eastern park of the city containing the major built-up areas.

4. Inventory of potentially polluting materials

In assessing potential accidents and incidents consideration has been given to the potentially polluting substances held on site, including review of their properties, toxicity and the volume stored. 0 details the raw materials stored on site and **Error! Reference source not found.** details the waste materials stored on site.

Table 2: Raw materials associated with the facility and their potential to pollute

Substance (Contaminants)	Use	State	Storage Arrangements	Toxicity/ Fate/ Mobility
Glucose syrup	Raw material	Thick viscous liquid	Storage within bulk storage tanks (1 x 60 tonne, 1 x 64, 1 x 18 tonne, 1 x 1 tonne, 1 x 0.25 tonne located within a building, 1 x 84 tonne and 1 x 60 tonne within a concrete bund).	Non-toxic but polluting to soil and water in the event of a large spillage/loss (high biological oxygen demand). Limited mobility at ambient temperatures. Readily degradable.
Sugar	Raw material	Granular solid	Storage within bulk storage tanks (2 x 100 tonne located externally).	Solid material, low mobility unless dissolved - readily soluble in water, non toxic but would have a high biological oxygen demand. Readily degradable.
Flour	Raw material	Powder	Storage within bulk storage tanks (1 x 40 tonne located externally, 1 x 1 tonne located internally).	Solid material, low mobility, non-toxic, not soluble in water.
Treacle	Raw material	Thick viscous liquid	Storage within bulk storage tank (1 x 60 tonne located externally).	Non-toxic but polluting to soil and water in the event of a large spillage/loss (high biological oxygen demand). Limited mobility at ambient temperatures. Readily degradable.
Diesel	Fuel for standby generator and sprinkler pump	Liquid	1,000 litre IBC located within a metal cabinet over integral drip tray, <250 litre day tank integral to firewater pump within a building over a concrete floor.	Mobile, polluting to soil, groundwater and watercourses in the event of a spillage/loss.

Substance (Contaminants)	Use	State	Storage Arrangements	Toxicity/ Fate/ Mobility
Packaged raw materials (acid, caustic, colours, flavours, additives)	Raw materials	Liquid	Multiple small containers c. 10 to 25 litres and IBCs either within locked refrigerated containers or located over drip trays within buildings.	Mobile, polluting to soil, groundwater and watercourses in the event of a spillage/loss.
Packaged raw materials (starch, sugars, gelatine, colours, coconut)	Raw materials	Solid	Multiple small containers (bags and sacks) located within buildings.	Limited mobility, potentially soluble, polluting to soil, groundwater and watercourses in the event of a spillage/loss.
Packaging (cardboard), consumables (glue, paper, plastic etc)	Packaging	Solid	Stacked on racks or in c. 20kg sacks on pallets.	Solid material, low mobility, non-toxic, not soluble in water.
Cleaning products (acid, caustic flammables)	Cleaning	Liquid	Multiple small containers c. 10 to 25 litres either within locked containers or located over drip trays within buildings.	Hazardous material, mobile, polluting to soil, groundwater and watercourses in the event of a spillage/loss.
Biocide	Cooling water treatment	Liquid	200 litre drum located within building.	Toxic, mobile, polluting to soil, groundwater and watercourses in the event of a spillage/loss.
Corrosion Inhibitor (3DT487)	Cooling water treatment	Liquid	200 litre drum located within building.	Toxic, mobile, polluting to soil, groundwater and watercourses in the event of a spillage/loss.
Caustic	Effluent pH balancing	Liquid	Externally located $5m^3$ capacity integrally bunded tank located within a concrete bund.	Mobile, polluting to soil, groundwater and watercourses in the event of a spillage/loss.
Sulfuric acid solution (98%)	Effluent pH balancing	Liquid	Externally located $5m^3$ capacity integrally bunded tank located within a concrete bund.	Mobile, polluting to soil, groundwater and watercourses in the event of a spillage/loss.

Substance (Contaminants)	Use	State	Storage Arrangements	Toxicity/ Fate/ Mobility
Glycol (mono propylene glycol)	Cooling systems	Liquid	22,000 litre capacity steel buffer tank located within a building.	Relatively low toxicity but polluting to soil, groundwater and watercourses in the event of a significant spillage/loss. Mobile, readily soluble and readily degradable.
Salt	Boiler water softening	Liquid (brine solution)	Up to a maximum of 1,500 kg.	Mobile, potentially polluting to watercourses in the event of a significant loss.
Boiler water treatment (oxygen scavenger)	Boiler water treatment	Liquid	379 litre capacity tank located inter-nally.	Polluting to soil, groundwater and watercourses in the event of a spillage/loss.
Boiler house water treatment (corrosion control & maintains heat transfer)	Boiler water treatment	Liquid	379 litre capacity tank located inter-nally.	Non toxic, low BOD and COD.
Boiler house water treatment (maintain alkalinity and sludge control)	Boiler water treatment	Liquid	379 litre capacity tank located inter-nally.	Polluting to soil, groundwater and watercourses in the event of a spillage/loss.
Transformer oils (mineral oil and synthetic oil) – no polychlorinated biphenyls (PCBs)	Coolant and insulating oils within electrical transformers.	Liquid	Between 580 and 1,055 litres held in sealed electrical transformers.	Polluting to soil, groundwater and watercourses in the event of a spillage/loss.
Bottled gasses (e.g. acetylene, oxygen, propane, methane).	Used for maintenance work.	Gas	Cylinders and bottles.	Gaseous state, therefore non-polluting to soil, groundwater and watercourses in the event of a spillage/loss.

Substance (Contaminants)	Use	State	Storage Arrangements	Toxicity/ Fate/ Mobility
Refrigerant gas	Used in cooling systems	Gas	Within closed refrigerant systems.	Gaseous state, therefore non-polluting to soil, groundwater and watercourses in the event of a spillage/loss.
Miscellaneous maintenance chemicals (various).	Small amounts of various aerosols, oils, grease etc. used for maintenance work.	Liquid, grease gas.	Stored in workshop hazardous substances cupboards.	Polluting to soil, groundwater and watercourses in the event of a spillage/loss.

Table 3: Process wastes and potential to pollute

Waste type	Hazardous / non hazardous	State	Storage arrangements	Toxicity/ Fate/ Mobility
Process effluent	Hazardous	Liquid	2x Externally located spiral wound polyethylene (PE100 HDPE) 91m^3 capacity tanks located within a shared concrete bund. Four effluent sumps, one for each manufacturing area (CLP, soft mints, jellies and hardmints).	Polluting to soil, groundwater and watercourses in the event of a spillage/loss, mobile.
Waste oil	Hazardous	Liquid	Stored in a 1,000 litre IBC located externally on a drip tray in the western yard.	Polluting to soil, groundwater and watercourses in the event of a spillage/loss, mobile.
General waste, plastic, cardboard, packaging.	Non-hazardous	Solid	Dedicated skips and smaller containers located externally in the western yard, eastern yard and south of the Ritz building.	Solid material, limited mobility.
Waste electronic and electrical equipment (WEEE)	Hazardous	Solid	Stored in designated container in the western yard.	Solid material, low mobility although possible leaching of contaminants.
Hazardous waste (oil containers, CFA, empty containers, waste fluorescent tubes)	Hazardous	Solid with liquid residues	Stored in a dedicated hazardous waste area south of the Ritz building and in the western yard in multiple containers and IBCs.	Potentially mobile, polluting to soil, groundwater and watercourses in the event of a spillage/loss.
Organic / food waste	Non-hazardous	Solid	Stored in covered skips in the western yard and central yard.	Solid material, low mobility although possible leaching of contaminants.
Metals	Non-hazardous	Solid	Stored in designated skip in the eastern yard.	Solid material, low mobility although possible leaching of contaminants.
Wood	Non-hazardous	Solid	Stored in designated skip in the eastern yard.	Solid material, low mobility.

5. Accident management plan

The potential for accidental releases resulting from the activities undertaken on site are identified and assessed in Table 4 below. This includes a summary of measures in place to manage / reduce accident risks and mitigate potential consequences. The risk assessment methodology is provided in Appendix 1.

Table 4: Potential accidental releases and associated risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Environmental Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures / controls will you take to reduce the risk?	How likely is this contact?	What harm could be caused?	What is the risk (with controls)?
Flooding from rivers leading to damage to site processes and/or mobilisation of polluting materials	Ground / groundwater / surface waters	Floodwaters / overland runoff / infiltration / drainage systems	**Preventative controls** ▪ The River Don borders and runs through the site. The site has a history of flooding from the river. ▪ Flood defence gates (5 no.) are located at critical points on site including entrance roads and main electrical supply buildings, as well as flood walls and non-return valves. ▪ Sheffield Emergency Response Procedure details actions to be taken in the event of a flood incident, including deployment of flood defence gates. ▪ Materials are stored in appropriately sealed containers, internally and/or in secondary containment bunds and cabinets, to minimise the risk of contents being mobilised or containers being washed away in a flood event. **In the event of an incident/accident** ▪ Initiate Emergency Response Procedure.	Unlikely	Medium	Moderate / Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Environmental Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures / controls will you take to reduce the risk?	How likely is this contact?	What harm could be caused?	What is the risk (with controls)?
			▪ Close all flood gates and isolate services, if it is appropriate and safe to do so. ▪ Remove mobile fuel/ chemical sources away from flood risk, if appropriate and safe to do so.			
Flooding due to drain blockages and/or excessively heavy rainfall which overwhelms the drainage system causing localised on-site surface water flooding leading to damage to site processes and / or mobilisation of polluting materials	Ground / groundwater / surface waters	Floodwaters / overland runoff / infiltration / drainage systems	**Preventative controls** ▪ Drains are monitored for blockages and cleaned as required. ▪ Materials are stored in appropriately sealed containers, internally and/or in secondary containment bunds or cabinets, to minimise the risk of contents being mobilised or containers being washed away in a flood event. ▪ Sheffield Emergency Response Procedure specifies actions in the event of loss of containment. ▪ Planned maintenance / inspection of site drainage systems. **In the event of an incident/accident** ▪ Initiate Emergency Response Procedure. ▪ Remove mobile fuel / chemical sources away from flood risk, if appropriate and safe to do so.	Unlikely	Medium	Moderate / Low risk
Fire leading to damage to site processes and / or release of polluting materials.	Nearby human receptors Local air quality and global climate impacts Ground / groundwater / surface waters	Air Overland runoff / infiltration / drainage systems	**Preventative controls** ▪ Fire risk assessment and fire strategy in place. ▪ Systems in place include: fire/smoke detection, alarms, sprinkler system (partial), emergency lighting, weekly testing, evacuation protocols, portable firefighting equipment etc.	Highly unlikely	Severe	Moderate / Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Environmental Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures / controls will you take to reduce the risk?	How likely is this contact?	What harm could be caused?	What is the risk (with controls)?
			▪ There are ATEX controlled areas within the factory (due to presence of dusty materials) with additional precautions in place to minimise explosion risks including use of anti-static shoes, regular cleaning to reduce dust accumulation, provision of explosion panels etc. **In the event of an incident/accident** ▪ Follow Emergency Response Procedure. ▪ Contact emergency services.			
Failure to contain firewater following fire event leading to localised on site surface water flooding leading to damage to site processes and / or mobilisation of polluting materials	Ground / groundwater / surface waters	Floodwaters / overland runoff / infiltration / drainage systems	**Preventative controls** ▪ Buffer storage (2 x 91 m^3 tanks) available at ETP. ▪ If appropriate and practicable site flood barriers could be used to contain firewater on site and minimise risk of escape to River Don. ▪ Materials are stored in appropriately sealed containers, internally and/or in secondary containment bunds or cabinets, to minimise the risk of contents being mobilised or containers being washed away in a flood event. ▪ Sheffield Emergency Response Procedure specifies actions in the event of loss of containment. **In the event of an incident/accident** ▪ Initiate site Emergency Response Procedure. ▪ Contact emergency services/EA/YW.	Highly unlikely	Severe	Moderate / Low risk
Generalised or localised power failure leading to failure of pumps /	Nearby human receptors	Air Overland runoff / infiltration /	**Preventative controls**	Unlikely	Medium	Moderate / low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Environmental Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures / controls will you take to reduce the risk?	How likely is this contact?	What harm could be caused?	What is the risk (with controls)?
control systems and uncontrolled or excess emissions to air, land or water	Local air quality and global climate impacts Ground / groundwater / surface waters	drainage systems	▪ Site emergency response plan contains key information in the event of a power failure incident including emergency contact numbers and location and nature of essential services including electrical substations. ▪ In the event of power failure systems will default to a fail-safe mode to prevent overflow, spillages or other unplanned event. ▪ Standby generator is available on site to provide electricity to critical IT systems and emergency lighting. **In the event of an incident/accident** ▪ Isolate systems as appropriate and initiate Emergency Response Procedures. ▪ Cease production activities if required to prevent spillage / escape of materials or effluent.			
Vandalism / site security failure leading to unplanned release of potentially polluting substances	Nearby human receptors Local air quality and global climate impacts Ground / groundwater / surface waters	Air Overland runoff / infiltration / drainage systems	**Preventative controls** ▪ Site security including fencing/walls around the entire perimeter, automatic control systems for entrance gates, permanently monitored CCTV with recording facilities and security personnel on site 24/7. ▪ Use of internal storage and bunds. **In the event of an incident/accident** ▪ Isolate systems as appropriate and initiate Emergency Response Procedures. ▪ Clean up spills and appropriate disposal of wastes.	Highly unlikely	Medium	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Environmental Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures / controls will you take to reduce the risk?	How likely is this contact?	What harm could be caused?	What is the risk (with controls)?
			▪ Carry out repairs (as required). ▪ Review security measures on site.			
Cyber security incident leading to unplanned release of potentially polluting substances	Nearby human receptors Local air quality and global climate impacts Ground / groundwater / surface waters	Air Overland runoff / infiltration / drainage systems	**Preventative controls** ▪ Mondelez operates an information security management system to provide cyber security protection and response. ▪ Regular cyber security training, awareness raising and testing is provided to Mondelez staff. ▪ Manual systems are available to provide back up functionality in the event of IT system failures. ▪ Site security including fencing/walls around the entire perimeter, automatic control systems for entrance gates, permanently monitored CCTV with recording facilities and security personnel on site 24/7. **In the event of an incident/accident** ▪ Isolate systems as appropriate and initiate Emergency Response Procedures. ▪ Clean up spills and appropriate disposal of wastes. ▪ Carry out repairs (as required). ▪ Review cyber security measures.	Highly unlikely	Medium	Low risk
Failure of ingredients, chemical or oil containment due to damage / impact or deterioration of storage	Ground / groundwater / surface waters	Overland runoff / infiltration / drainage systems	**Preventative controls** ▪ Oil/fuel and chemical storage tanks are bunded (using either fixed or mobile bunds) and/or located internally. ▪ Surface water runoff from north side trailer park is discharged via an oil interceptor. Outfall to	Unlikely	Medium	Moderate / Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Environmental Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures / controls will you take to reduce the risk?	How likely is this contact?	What harm could be caused?	What is the risk (with controls)?
containers, pipework or valves			river has a flapstopper valve (electrically powered) which can be closed in the event of a spillage. ▪ Tank and pipework inspections undertaken as part of routine maintenance. ▪ Sheffield Emergency Response Procedure specifies actions in the event of loss of containment, spill kits available across the site. ▪ Some further opportunities to reduce pollution risks have been identified. Refer to proposed improvement programme. **In the event of an incident/accident** ▪ Isolate systems as appropriate and initiate Emergency Response Procedures. ▪ Clean up spills and appropriate disposal of wastes. ▪ Carry out repairs (as required). ▪ Review systems to prevent recurrence.			
Spillage of ingredients, chemicals or oil/fuels during delivery	Ground / groundwater / surface waters	Overland runoff / infiltration / drainage systems	**Preventative controls** ▪ Delivery procedures inc. delivery checklist is used by site staff. This includes checks on available space in receiving tank, pipework connections/seals, checks for leaks and spills etc. ▪ Surface water runoff from north side trailer park is discharged via an oil interceptor. Outfall to river has a flapstopper valve (electrically powered) which can be closed in the event of a spillage.	Unlikely	Medium	Moderate / Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Environmental Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures / controls will you take to reduce the risk?	How likely is this contact?	What harm could be caused?	What is the risk (with controls)?
			▪ Some further opportunities to reduce pollution risks have been identified. Refer to proposed improvement programme. **In the event of an incident/accident** ▪ Isolate systems as appropriate and initiate Emergency Response Procedures. ▪ Clean up spills and appropriate disposal of wastes. ▪ Review systems to prevent recurrence.			
Excessive noise from plant or equipment e.g., due to equipment deterioration or failure	Nearby human receptors	Air	**Preventative controls** ▪ Regular maintenance undertaken to ensure equipment operates within normal noise parameters. ▪ Site located in a predominantly commercial / industrial area within an urban setting with other significant noise sources e.g. A61 road. No history of noise complaints from the site. **In the event of an incident/accident** ▪ Investigate cause and implement preventive measures, which may include system maintenance interventions.	Unlikely	Mild	Low risk
Failure of effluent treatment facilities e.g. flow or pH monitoring or chemical dosing equipment leading	Public sewer (asset damage due to too high or too low pH rather than an	Drainage systems	**Preventative controls** ▪ Planned maintenance including calibration for monitoring equipment, pumps etc at the ETP. ▪ Continuous monitoring of influent and effluent at the ETP.	Unlikely	Mild	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Environmental Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures / controls will you take to reduce the risk?	How likely is this contact?	What harm could be caused?	What is the risk (with controls)?
to the short-term discharge which may not comply with trade effluent consent (pH too high or too low).	immediate environmental impact)		▪ Effluent treated at the ETP is discharged to public sewer and treated at Yorkshire Water's Blackburn Meadows WwTW, providing a second line of defence. ▪ ETP incorporates continuous pH monitoring with a recycle facility to automatically return effluent back to the ETP for further treatment if required. **In the event of an incident/accident** ▪ Investigate cause and implement preventive measures, which may include system maintenance interventions. ▪ Contact Yorkshire Water to inform them of the incident.			
Failure of pumps at effluent sumps (C2, C3, C4) leading to the short-term overflow of untreated effluent to sewer which may not comply with trade effluent consent (pH too high or too low).	Public sewer (asset damage due to too high or too low pH rather than an immediate environmental impact)	Drainage systems	**Preventative controls** ▪ Planned maintenance of sump pumps. ▪ Hydrostatic level sensor is installed in the sump to monitor the level in the sump and control the operation of the pumps. ▪ An alarm with recorded log is provided to indicate if the pumping station fails allowing initiation of corrective actions. ▪ Effluent treated at the ETP is discharged to public sewer and treated at Yorkshire Water's Blackburn Meadows WwTW, providing a second line of defence. **In the event of an incident/accident**	Unlikely	Mild	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Environmental Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures / controls will you take to reduce the risk?	How likely is this contact?	What harm could be caused?	What is the risk (with controls)?
			▪ Investigate cause and implement preventive measures, which may include system maintenance interventions. ▪ Contact Yorkshire Water to inform them of the incident.			
Very low temperatures causing liquids within pipework to freeze and rupture leading to release of potentially polluting liquids	Ground / groundwater / surface waters	Overland runoff / infiltration / drainage systems	**Preventative controls** ▪ Pipe lagging and/or trace heating provided where required. ▪ Planned preventative maintenance in place, including regular site walkover inspections. **In the event of an incident/accident** ▪ Isolate systems as appropriate and initiate Emergency Response Procedures. ▪ Clean up spills and appropriate disposal of wastes. ▪ Carry out repairs (as required). ▪ Review systems to prevent recurrence.	Unlikely	Medium	Moderate / Low risk
Excessive emissions to air from boilers e.g., due to equipment failure, poor performance or malfunction leading to incomplete or inefficient combustion	Nearby human receptors Local air quality and global climate impacts	Air	**Preventative controls** ▪ Planned preventative maintenance in place for equipment to ensure assets continue to meet original specification on emissions. ▪ Site boilers are new (installed 2024/25) with high quality modern control systems. The risk of excess emissions is very low. ▪ Site operational knowledge supported through contracts with specialist providers.	Unlikely	Mild	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Environmental Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures / controls will you take to reduce the risk?	How likely is this contact?	What harm could be caused?	What is the risk (with controls)?
			▪ Boiler duty/standby provision allows any poor performing boiler to be taken out of service for maintenance work if required. **In the event of an incident/accident** ▪ Investigate cause and implement preventive measures, which may include system maintenance interventions.			

6. Accident and incident response

Accidents and Incidents are managed in accordance with the emergency and incident policies and procedures including (but not limited to):

- Sheffield emergency response procedure;
- Sheffield emergency response plan;
- Mondelez Sheffield fire strategy;
- Mondelez Sheffield fire risk assessment.
- Mondelez global HSE standard HSE5 Accident and Incident Notification Escalation and Investigation.

The Mondelez incident classification system establishes requirements for accident and incident management. Minor incidents and complaints are managed locally using the daily management system (DMS) reporting and management structure. This includes reporting to site management and subsequent follow up managed via daily DMS meetings and logs.

For more significant incidents and complaints Mondelez utilises the Enablon online system to report, record, manage and assess incidents and accidents.

In the event of a significant incident a root cause analysis is conducted. Actions are identified, reported, recorded and communicated to prevent reoccurrence.

If an incident with potentially significant environmental consequences occurs, Mondelez will notify the Environment Agency without delay, and in accordance with the procedures and requirements specified in the site environmental permit. If applicable Yorkshire Water, Sheffield City Council and/or other impacted bodies would also be contacted without delay.

7. Emergency contacts

Name	Contact
Mondelez Sheffield	Gatehouse: 07939838923 Security: 07786922072
Sheffield City Council	0114 2734567
Environment Agency	0800 807060
Yorkshire Water	0800 573553

Appendix 1: Risk Assessment Methodology

The risk assessment methodology employed for the accident management plan is provided in Tables A to D below.

The overall risk rating for each of the identified risk scenarios is determined on the basis of the probability of the scenario occurring (the probability/likelihood score) and the environmental consequence(s) if the scenario were to occur (the consequence score). The probability and consequence categories used in this methodology are provided in Tables A and B below.

Table A: Classification of Consequences

Classification	Definition
Severe	▪ Acute risks to human health. ▪ Short-term risk of pollution of water resource (e.g. major spillage or release of highly polluting substance). ▪ Ecological system effects – substantial or irreversible adverse changes to a protected location. Immediate risks ▪ Catastrophic damage to buildings or property (e.g. explosion causing building collapse).
Medium	▪ Chronic risks to human health. ▪ Moderate pollution of water resources (e.g. moderate spillage volumes or release of materials with moderate potential for damage). ▪ Ecological system effects – adverse changes to a protected location. ▪ Significant damage to buildings, structures and services (e.g. damage rendering a building unsafe to occupy, such as foundation damage).
Mild	▪ Non-permanent health effects to human health. ▪ Minor pollution of non-sensitive water resources. ▪ Damage to non-sensitive environments (unprotected ecosystems e.g. crops). ▪ Minor damage to buildings, structures and services
Minor / Negligible	▪ Negligible, non-permanent health effects to human health easily prevented by appropriate use of PPE. ▪ Minor damage to non-sensitive environments (unprotected ecosystems e.g. crops). ▪ Easily repairable effects of damage to buildings, structures, services or the environment (e.g. discoloration of concrete, loss of plants in a landscaping scene).

Table B: Classification of probability / Likelihood

Classification	Definition
High Likelihood	An event is very likely to occur in the short term, and is almost inevitable over the long term.
Likely	It is probable that an event will occur. It is not inevitable, but possible in the short term and likely over the long term.
Unlikely	Circumstances are possible under which an event could occur. It is by no means certain that even over a longer period such an event would take place, and less likely in the short term.
Highly Unlikely	It is improbable that an event would occur even in the long term.

Table C below provides the matrix used to identify the overall risk category using these consequence and probability categories.

Table C: Risk Matrix and Terminology Used for Risk Assessments

		Consequence			
		Severe	**Medium**	**Mild**	**Minor / Negligible**
Probability (Likelihood)	**High Likelihood**	Very high risk	High risk	Moderate risk	Moderate / Low risk
	Likely	High risk	Moderate risk	Moderate / Low risk	Low risk
	Unlikely	Moderate risk	Moderate / Low risk	Low risk	Negligible risk
	Highly Unlikely	Moderate / Low risk	Low risk	Negligible risk	Negligible risk

The overall risk categories are described in Table D below.

Table D: Description of Risk Categories

Term	Description
Very high risk	Severe harm to a receptor may already be occurring OR a high likelihood that severe harm will arise to a receptor, unless immediate remedial action works / mitigation measures are undertaken.
High risk	Harm is likely to arise to a receptor, and is likely to be severe, unless appropriate remedial actions / mitigation measures are undertaken. Remedial works may be required in the short term, but likely to be required over the long term.
Moderate risk	Possible that harm could arise to a receptor but low likelihood that such harm would be severe. Harm is likely to be medium. Some remedial works may be required in the long term.
Moderate / low risk	Possible that harm could arise to a receptor, but where a combination of likelihood and consequence results in a risk that is above low, but is not of sufficient concern to be classified as medium. It can be driven by cases where there is an acute risk which carries a severe consequence, but where the exposure is unlikely.
Low risk	Possible that harm could arise to a receptor. Such harm would at worse normally be mild.
Negligible risk	Low likelihood that harm could arise to a receptor. Such harm unlikely to be any worse than mild.