Accident Management Plan

Document No : **TW-PLN-045**

Revision No : **1**

Issue Date : **22/04/2026**

Review Date : **April-27**

Doc Classification : **Tier 1**

Revision Tracking

Revision	Comments	Prepared By	Reviewed By	Approved By	Date
1	1st Final Version Issued	J Easterbrook (Sol Environment)	S Rainey (Sol Environment)	L Moore (Tungsten West)	22nd April 2026

TUNGSTEN WEST

Contents

1 Introduction 2
2 Raw Materials 3
3 Risk Magnitude Estimations 5
4 Accident Management Plan 6
5 Reporting and Records 13
6 Emergency Community Engagement 14
7 Summary and Conclusion 15
Annex A Incident Investigation Form 16

1 INTRODUCTION

This document has been prepared in support of the Mineral Processing Facility (MPF) Environmental Permit (EPR/AP3203ML) specifically in accordance with Pre Operational Condition 1, prior to operations recommencing on site.

The development of the site consists of three main areas, each with the relevant emergency procedures in place:

1. The mining, quarrying and base mineral extraction operation. This is carried out under Planning authorisations;
2. The MPF, which is regulated by the Environment Agency. The MPF is designed to crush and separate mineral ore, which then undergoes a series of physical and chemical processes to remove inert ferrous contaminants and separate the tungsten and tin concentrates for export offsite; and
3. The Mining Waste Facility (MWF), which is regulated by the Environment Agency. The MWF is designed to contain the mining waste associated from the MPF.

This document represents the Accident Management Plan (AMP) specifically in support of the MPF operations restarting at Hemerdon Mine. This AMP has been produced in accordance with EA guidance Document 'How to comply with your Environmental Permit (EPR 1.00)'.

It is stipulated under this guidance document that the AMP fulfils the following four key requirements:

- Identifies events or failures that could damage the environment;
- Assesses how likely they are to happen and the potential environmental consequences;
- Actions to minimise the potential causes and consequences of accidents; and
- The actions that are required to be carried out if an accident happens.

This AMP has been implemented and maintained at the site as part of the company's Environmental Management System and will ensure the site and all operatives are fully prepared for such incidents.

The AMP and all associated procedures will be reviewed at least every four years or as soon as practicable after an incident, with changes made accordingly to minimise the risk of occurrence / recurrence.

.

2 RAW MATERIALS

Table 2.1 below lists the main raw materials used within the MPF. Additionally, the site will utilise small amounts of general purpose materials such as wood, aggregate, metal, cement etc. for routine repairs.

All raw materials will be recorded and assessed for their environmental impact prior to use on site. A Control of Substances Hazardous to Health (COSHH) assessment will be undertaken prior to the use of chemicals and added to the COSHH inventory[1].

Table 2.1 Inventory of Raw Materials

Reagent	Use	Average Annual Consumption	Storage Method	Maximum Quantities stored on site
Ferric Sulphate	Water Treatment Plant coagulant	160,963L	Bulk liquid stored in specialist tanks	21,000L
Ferrosilicon	Process	125.97t	1 tonne bags	20t
Hydrogen Peroxide (~35% Solution)	Water Treatment Plant oxidiser	34.99m^3	1m^3 IBC stored in shed / container	9000L
Diesel	MPF – concentrate pre dryer, kiln burners, kiln reductant, incinerator, tin dryer.	2,764,368L	Self bunded containerised diesel tank	160,000L[2]
Sulphuric Acid (35% Solution)	ASTP pH Control	230,947L	Bulk liquid stored in specialist tanks	8500L
Grinding Media	Primary and Regrind Milling	232.35t	1t Steel drums, stored externally	20 drums
Flocculant	Process	69.98t	750kg bulk delivery	15t

[1] Material Safety Data Sheets (MSDS) for potentially hazardous materials or chemicals will be held on site with the COSHH Register.

[2] Combined volume of the kiln diesel tank and the storage diesel tank on site.

Copper Sulphate	Process	0.56t	50kg bag storage	100kg
Potassium Amyl Xanthate	Process	1.12t	Bulk chemical storage area	300kg
Frother – Interfroth	Process	56.55L	Bulk chemical storage area	60L
Hydrated Lime Putty (43%)	Process	31.49t	Bulk chemical storage area	10t
Potable Water	Various	500L	South West Water (SWW) Mains	-
Raw Water	Top up & process	936,000L	Flat bottom Steel tank	150m^3
Process Water	Process		Flat bottom Steel tank	2800m^3
Compressed Air	Flotation Blower	-	-	-
LPG	Various	1	86 & 34KG bottles held in the bottle store	86kg bottles – 4 bottles 34kg bottles – 5 bottles
Lubricating Oil	Various	3L	25L and 205L drums in the Bunded oil store	Various in small quantities
Hydraulic Oil	Various	2.5L	25L and 205L drums in the Bunded oil store	Various in small quantities

3 RISK MAGNITUDE ESTIMATIONS

The AMP (Table 4.1 overleaf) has adopted a risk assessment approach to each potential hazard by combining the probability and magnitude of the potential risk to give an estimation of the risk prior to any mitigation measures. The risk management measures, which are designed to reduce the likelihood of occurrence, are then detailed followed by an estimation of the actual risk post-mitigation (Residual Risk Rating).

The DEFRA guide to risk assessment[3] indicates the approach of subjectively classifying the magnitude of potential consequences into four categories depending upon the degree of the impact that the potential risk could have and the context in which the risk is being assessed. The classification is used as a guide in this Risk Assessment.

The four categories are as follows:

- **Severe**: Possible irreparable damage to environmental resources;
- **Moderate**: Possible damage to environmental resources which are limited within a regional context;
- **Mild**: Possible effects might be transient damage to environmental resources which are commonplace on a regional basis and alternative sources are readily available; and
- **Negligible**: The effects are negligible or might cause very slight temporary deterioration in the current environmental resource quality.

The matrix shown below, in Table 3.1, considers the probability of the potential risk against the magnitude of the potential impact, thereby giving an estimation of the resulting likelihood of the risk occurring.

Table 3.1 Risk Estimation Matrix

Probability of potential Risk	Magnitude of Potential Impact			
	Severe	Moderate	Mild	Negligible
High	High	High	Medium/Low	Near Zero
Medium	High	Medium	Low	Near Zero
Low	Medium	Medium	Low	Near Zero
Negligible	Medium	Medium/Low	Low	Near Zero

The qualitative risk assessment for the Accident Management Plan has been based on the matrix outlined above.

The final stage of the risk assessment is the judgment of the severity of the residual risk following implementation of the mitigation measures.

[3] A Guide to Risk Assessment and the Risk Management for Environmental Protection, 1995.

4 ACCIDENT MANAGEMENT PLAN

Table 4.1 Accident Management Plan

Accident Scenario	Probability of Accident Occurring	Magnitude of Potential Impact	Risk Rating before mitigation	Risk Management	Residual Risk Rating (following mitigation)
1. Spills and leaks / loss of containment / transfer of substances / overfilling of tanks or containers	**Medium**	**Moderate to Severe** Spillage and leakage could occur during deliveries, fuelling, vehicle breakdowns and or damage to storage tanks and/or bunds. Loss of containment could result in potentially polluting liquids being discharged to surface water drainage systems and to controlled waters.	**MEDIUM**	All areas internally within the MPF are entirely sealed hardstanding with fully contained and sealed drainage and therefore considered to have a low potential for impacts to ground water. No waste water from inside the building will be discharged to the surface water management system. Waste water will be recirculated via the water treatment plant or discharged to the Mining Waste Facility. The wider permitted area includes surface water drainage network, Run Of Mine (ROM) pad and associated infrastructure. All potentially polluting chemicals used in the process will be stored appropriately in sealed silos, bags, drums or bunded areas and in accordance with the manufacturers specifications and regulation. There are several COSHH Management Plans in place for the management of potentially polluting chemicals stored on site. The MPF is managed by the SCADA system which will have high/low level controls and alarm system in place to notify of any potential breaches of containment.	**LOW**

				A sealed drainage and containment system for tanks / containers containing potentially polluting liquids has been constructed so that any leaks / spills are contained. In the event of a fire, the drainage system would be isolated to prevent any fire water escaping off site. All storage tanks / containers have been constructed to the appropriate British Standard. All storage tanks on site will benefit from primary and secondary containment with the ability to contain 110% of the tank volume. There will also be tertiary containment from the surrounding catchpits and Smallhanger North Tank. All tanks are inspected visually on a daily basis by site staff to ensure continued integrity of tanks and identify any necessary remedial action. These inspections will be incorporated as part of the daily / weekly / monthly Reg 12 Inspections. Minor spills to be cleaned up immediately, using sand or proprietary absorbent. Resultant materials to be placed in container for off-site disposal at appropriate facility, if necessary. Immediate action to be taken in event of major spill which is likely to cause polluting emissions to the environment to prevent liquid from entering surface water drains or any adjacent unsurfaced ground. Spillage to be cleared immediately and placed in containers for offsite disposal. The EA will be informed. The Operator has established the following accident and emergency procedures:	

				• Suite of Risk Registers; • Internal Emergency Plan; • External Emergency Plan; and • Emergency Preparedness and Response Plan.	
2. Vandalism	**Medium**	**Moderate** The site could be subject to intentional vandalism and damage by intruders/trespassers who could cause damage or harm to the plant and equipment, spills and leaks to tanks.	**MEDIUM**	On-site security measures are in place and implemented on site to prevent acts of vandalism that may result in damage or harm to the site. The security team will operate in accordance with the Security Management Plan. Site will be manned 24/7 by a dedicated site security team, who undertake site wide security patrols. Security lighting is operational on site. The entire site is enclosed by a perimeter fence and signage. Site access is via the main entrance / security cabin and barrier. Gates and fencing are inspected daily by the security team to identify deterioration and damage and the need for repair. Fencing and gates are maintained and repaired as needed to ensure their continued integrity. If damage is sustained, repair will be made within the same working day. If this is not possible, suitable measures will be taken to prevent unauthorised access to the site and permanent repairs will be affected as soon as is practicable. All visitors to site will report to the security cabin to sign in / out, thereby minimising the risk of unauthorised visitors on the site.	**LOW**

				Operational procedures have been implemented including regular inspections, ensuring continual monitoring of security provision at the site.	
3. Flooding	**Very Low** The site does not sit within a flood zone.	**Low**	**LOW**	The site is not located within an area designated at risk of flooding from surface waters or rivers. The MPF is not set within close proximity to the wider site surface water drainage network and is set at higher elevations to the pit operations. The site's surface water network is managed in accordance with the site's Surface Water Management Plan. In the unlikely event of a flood to the MPF, the site is equipped with a sealed drainage and bunding systems which will prevent the inflow of offsite flood water into critical areas (bunds, tanks, storage, etc.).	**LOW**
4. Outbreak of fire Plant malfunction Electrical equipment that could provide an ignition source	**Medium**	**Severe**	**MEDIUM**	All plant is subject to a planned preventative maintenance schedule. The plant has significant control and safety systems all of which are interlocked to ensure a very controlled shutdown in the event that the plant undergoes operational difficulties. All plant has been specified to be intrinsically safe and earthed in accordance to best practice. All aspects of the plant and associated infrastructure are constructed of non-combustible materials. The plant has been designed to shut down (fail safe) in the event of an emergency.	**LOW**

				Any tanks / containers containing flammable and potentially polluting liquids are constructed so that any leaks / spillages are contained and responded to in accordance with established emergency procedures. Fire suppression equipment is audited weekly by site personnel with an annual third party audit undertaken to ensure all equipment is compliant. A Site Specific Risk Information Policy meeting is held annually in conjunction with the Local Fire and Rescue Team. Hot works are not permitted to be undertaken within the MPF without a hot works permit in place. In the event of a fire the following actions will be taken: • In the event of a fire the fire brigade will be notified immediately and the EA as soon as practicable. • The Emergency Preparedness and Response Plan will be actioned. • The MPF will be immediately evacuated. • The burning area will be isolated and attempts will be made to extinguish the fire utilising the on-site firefighting systems if safe to do so. Records of fire incidences will be kept on site together with a summary of remedial action taken. Smoking will not be permitted in the operational areas of the site. There will be designated smoking areas around site. The MPF operates in accordance with the site's Fire Risk Assessment.	

5. Radiation exposure Non-ionising and ionising radiation	**Low**	**Moderate**	**MEDIUM**	A Radiation Management Plan details the processes for safe interaction, storage, monitoring and maintenance of the onsite sealed sources. All sealed sources within the MPF are within Regulation Substances Regulation (RSR) compliant enclosures which are inspected daily. Annually, a third party Radiation Protection Advisor (RPA) in conjunction with a Counter Terrorism Security Advisor (CTSA) will inspect all sealed sources on site. The site has appointed Radiation Protection Supervisors, who will be available on each shift. All MPF operators will be trained in the correct and safe interaction, storage, monitoring and maintenance of the onsite sealed sources. All operators will be provided with the necessary and appropriate PPE.	**LOW**
6. Failure of mains services Failure in the mains services, water or electricity.	**Medium**	**Low**	**MEDIUM**	In the event of sudden disconnection of the grid the MPF will shut down. The plant has been designed with a number of fail safe and automatic shutdown systems, where appropriate. The plant also has in place a number of Emergency Shutdown Controls to ensure safe shut down in an emergency. All conveyors will cease operating so no further transfer of material can occur. The site will utilise mobile pumps with a diesel generator to ensure containment is maintained within the MPF sumps.	**NEGLIGIBLE**

7. Operator error / failure of equipment The unexpected breakdown of any part of the plant could result in short term build up of waste. The result of operator error could result in the plant not functioning efficiently.	**Medium**	**Low**	**LOW**	The plant has been designed with a number of fail safe and automatic shutdown systems, where appropriate. The plant also has in place a number of Emergency Shutdown Controls to ensure safe shut down in an emergency. Interlocks will be incorporated into the design to prevent abnormal operation. The system will shut down or inhibit start-up of various aspects of the plant in the event that set-point conditions are not met. All equipment is subject to a Planned and Preventative Maintenance Programme, to minimise unplanned failures. All operators are inducted on site and trained in the operation of the MPF and all relevant Standard Operating Procedures (SOPs) to their role. A training matrix is implemented on site to ensure each member of staff has received the relevant training, education and experience necessary to undertake their required duties. The MPF Manager will be responsible for implementing risk management measures.	**NEGLIGIBLE**
8. Extreme Weather The unexpected shutdown as a result of extreme weather	**Medium**	**Moderate**	**MEDIUM**	The weather is monitored through the onsite weather station and reported on daily within the daily site operations meeting and emailed to all operational staff to support daily operational planning. This will be the first indication of potential extreme weather events therefore additional measures can be pre-planned and implemented. In the event of upcoming extreme cold weather events the MPF will be safely shut down and all pipework, sumps, tanks (where applicable) will be drained.	**MEDIUM**

5 REPORTING AND RECORDS

Responsibility for managing environmental complaints, incidents, and non-conformances rests with the MPF Manager, with support and oversight provided by the Environmental Manager.

Environmental complaints and non-conformances include, but are not limited to:

- System failure identified through internal audit;
- Environmental Incidents, accidents, and emergencies situations; and
- Other operational system failures.

The MPF Manager is responsible for ensuring that all environmental incidents and non-compliances are reported, managed, and investigated, including the implementation of appropriate remedial and preventive actions.

All environmental non-compliances, including details of remedial actions taken and any operational changes made to prevent recurrence, shall be recorded in My Compliance and supported by completion of an Incident Investigation Form (Annex A). My Compliance will capture details including the nature of the incident, corrective actions, responsible persons, and the outcome of investigations.

All environmental incidents shall be notified to the Environmental Manager, who will:

- Review incidents and investigations for adequacy and compliance;
- Provide technical input where required; and
- Approve (sign off) records to confirm completeness and regulatory compliance.

Electronic records of non-conformances and other environmental incidents will be maintained within My Compliance. Records will include the date, time, nature of the event, investigation findings, and remedial actions taken.

All relevant notifications and submissions to the Environment Agency will be coordinated by the Environmental Manager (or delegated competent person) and submitted in writing, quoting the Environmental Permit reference number and permit holder.

Records will be retained for a minimum of six years. Where incidents relate to off-site environmental effects or matters affecting land and groundwater, records will be retained until surrender of the Environmental Permit. Responsibility for managing environmental complaints, incidents, and non-conformances rests with the MPF Manager, with support and oversight provided by the Environmental Manager.

6 EMERGENCY COMMUNITY ENGAGEMENT

To encompass the various types of engagement between Tungsten West and the surrounding communities, a Stakeholder Engagement Plan has been developed. This includes key aims and a communications and stakeholder engagement action plan which ensures consistency in the provision of information and the way in which community contact is developed, maintained and encouraged. The Plan will be updated in consultation with the local communities via the Local Liaison Group (LLG) to ensure it is in line with community expectations. All contact details for the surrounding receptors will be stored securely on site.

In the event of an emergency which has the potential to affect the surrounding environment and community, the Internal Emergency Incident Alert procedure[4] will be implemented. A decision will be made by Devon County Council (DCC) Incident Coordinator to initiate the Off Site Emergency Plan. This procedure will ensure all off site parties are made aware of the situation and circumstances of the incident.

[4] Provided as part of Tungsten West's Internal Emergency Plan

7 SUMMARY AND CONCLUSION

This document has been prepared to meet the requirements pertaining to Accident Management Plans within the Environment Agency guidance document EPR1.00 'How to Comply with your Permit'.

It is concluded that despite the Installation having the potential for a low-moderate environmental impact to the environment, the mitigation measures incorporated into the design of the plant and the site infrastructure are sufficient to mitigate the risks.

The company operates and continues to operate using an established suite of procedures for the control and management of all materials and plant in use in their process. These procedures detail the required actions to be taken in the event of an emergency and should be used in the first instance for any accident and emergency at site.

Tungsten West operate the MPF and this AMP in conjunction with the following documents to adequately respond to potential emergency scenarios identified on site:

- Suite of Risk Registers;
- Internal Emergency Plan;
- External Emergency Plan; and
- Emergency Preparedness and Response Plan.

ANNEX A INCIDENT INVESTIGATION FORM

INCIDENT INVESTIGATION FORM

Incident Investigation Form
This form should be filled in by the nominated document controller of the Investigation Review Team and signed by the nominated lead of the Investigation Review Team.

Section 1: Overview

Name of Injured Person(s)		Date of Incident	
Nominated Investigation Document Controller		Investigation Review Team Members	
Nominated Investigation Lead		Date of Investigation	
Initial Investigation Tier Designation	Tier 1	☐	
	Tier 2	☐	
	Tier 3	☐	
If not appropriate what is the actual severity of the incident?	Tier 1	☐	
	Tier 2	☐	
	Tier 3	☐	

Section 2: Investigation Information Gathering

1. Where and when did the incident happen? *Include building and room or site. For outside areas consider aerial map with site of incident marked.*	
2. Who was injured/ suffered ill health or was otherwise involved with the incident? *Include name, employee number if known, length of service, status e.g. employee, contractor, public*	N/A ☐
3. Were there any witnesses to this incident?	

Yes ☐	No ☐	N/A ☐

3.1 Have witness statements been taken?		
Yes ☐	No ☐	N/A ☐

Supporting documents included in this investigation:
☐ Witness statements - Name(s)
☐ Other (Please state)

4. How did the incident happen? *(What activities were being carried out at the time list any equipment involved including make, model, serial number where possible. Be as detailed as possible).*

Supporting documents/items included in this investigation:
☐ Photographs
☐ CCTV or video/audio files
☐ Plans
☐ Physical evidence e.g. whole of damaged parts of equipment, samples of substances, clothing or footwear
☐ Manufacturers/suppliers user guides
☐ Results of tests e.g. dust or noise monitoring
☐ Health surveillance records
☐ Best practice guidance e.g. trade association or Health and Safety Executive guidance
☐ Other (Please state)

5. Was there a risk assessment and/or safe operating procedure (SOP) for the task?	Yes ☐	No ☐	N/A ☐
5.1 Did the risk assessment/SOP cover all aspects of the task?	Yes☐	No ☐	N/A ☐
5.2 Was it being followed?	Yes☐	No ☐	N/A ☐

5.3 Supporting documents/items included in this investigation:

☐ Risk assessment(s)
☐ Standard Operating Procedures

Give Details, include document numbers:

6. Was there anything unusual or different about the working conditions at the time of the incident? e.g. weather, visitors, contractor movements etc.

Yes ☐	No ☐	N/A ☐

Give details:

7. What negative(s), if any, were caused?

8. Was maintenance, cleaning or housekeeping sufficient?

Yes ☐	No ☐	N/A ☐

8.1 If no, explain why not:

Supporting documents/ items included in this investigation:

☐ Maintenance Records
☐ Cleaning records
☐ Other (Please state)

Give Details:

9. Was a lack of competency/training a factor in this incident?

Yes ☐	No ☐	N/A ☐

9.1 Give details:

Supporting documents/items included in this investigation:

☐ Training records

☐ Other (Please state)

10. Did the workplace layout influence the incident?

Yes ☐	No ☐	N/A ☐

10.1 How did the workplace influence the incident? *e.g. maintenance, routine/non-routine work being completed.*

11. Was safety equipment and/or personal protective equipment provided?

Yes ☐	No ☐	N/A ☐

12.1 Was the PPE suitable for the task and being used correctly?

Yes ☐	No ☐	N/A ☐

Give details:

12.2 Was PPE used during the task?

Yes ☐	No ☐	N/A ☐

12.3 Was PPE compatible with other PPE used?

Yes ☐	No ☐	N/A ☐

12. Are you aware of any similar incidents?

Yes ☐	No ☐

Give details:

13. Is there any other information not detailed above that is relevant to this incident?

Yes ☐	No ☐

Give details:

14. Why did the incident happen? *(Use the Five Why's and Just Culture models to identify root causes)*

Why Question:		Answer:
1		
2		
3		
4		
5		

15. Corrective Action(s) *(also record in My Compliance. What actions are to be taken? By whom? What timeframe? Escalation route?)*

Investigation Signed Off By:	Date: