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# INTRODUCTION

The Medisort site is located on a corner plot of 0.86 acres on Fort Road which is in the NE corner of the Lineside Ind Est.We have Industrial premises on 3 sides of us the 4th side is a road boarding the allotments. There has been an operating clinical waste facility here since 2004 which was Initially, a transfer’s station, then moving on to processing clinical waste with one autoclave. Medisort took over the site in May 2010, Medisort later installed a second autoclave.

The site consists of the yard area and two covered buildings, which houses both autoclaves and associated equipment. All loading and unloading of waste to done to the rear of the building via two large roller shutter doors.

**Site Location:**

Medisort Ltd

Fort Road

Wick

Littlehampton

BN17 7QU

/// rungs. Choice. indoor

OS Map Ref: TQ021026

Prevailing wind direction: West

**(D007 Littlehampton Site green line)**



North

Prevailing wind:West

# MANAGEMENT

The directors of Medisort Ltd are responsible for the site's day-to-day operations. These responsibilities include, as a minimum, compliance with the site permit and supporting documents, including legislative guidance specific to the acceptance and treatment of clinical wastes. The prevention of fire because of their business operations and protection of the environment and local amenities within the proximity of their business.

The directors shall ensure that all management and staff at the facility are aware of the conditions of this FPP (Fire Prevention Plan), and records of training in this regard will be maintained on-site and reviewed as part of their internal auditing system. Site induction procedures for third parties and new members of staff shall include details of its fire prevention plan (FPP).

This Fire Prevention Plan should be read in conjunction with the EMS and Site Permit to ensure a comprehensive understanding of the facility's requirements and its safe operation are attained by management and individuals associated with the day-to-day running of the facility.

A technically competent manager (TCM) holding the relevant qualification to manage a treatment and transfer facility will be in attendance as required by the Environment Agency guidelines and shall maintain continued competence and accreditation by the Waste Management Training & Advisory Board (WAMITAB).

# WASTE ACTIVITIES

Site Permit Number EPR/QP3536TW

AR1: Physio-chemical treatment of Hazardous Clinical Waste and associated EWCs.

Steam sterilization via Autoclaving.

* + 40 tonnes per day

AR3 and AR5: Repackaging and Waste Transfer:

Bulking up of waste to be sent on to 3rd party disposal.

* + A maximum of 50 tonnes at any one time for Hazardous Waste.
  + A maximum of 120 tonnes at any one time for all Waste.

**Permitted waste types and quantities.**

|  |  |  |
| --- | --- | --- |
| **Table S2.2** **Permitted waste types and quantities for thermal treatment in autoclaves (AR1)** | | |
| **Maximum quantity** | **The maximum annual throughput for the clinical waste activity is 12,000 tonnes.** | |
| **Waste code** | **Description** | |
| **16** | **WASTES NOT OTHERWISE SPECIFIED IN THE LIST** | |
| **16 02** | **Wastes from electrical and electronic equipment** | |
| 18 01 03\* and 16  02 14 | discarded equipment other than those mentioned in 16 02 99 to 16 02 03 with infectious contamination | |
| 18 01 03\* and 16  02 16 | components removed from discarded equipment other than those mentioned in 16 02 05 with infectious contamination | |
| **18** | **WASTES FROM HUMAN OR ANIMAL HEALTH CARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTH CARE)** | |
| **18 01** | **wastes from natal care, diagnosis, treatment or prevention of disease in humans** | |
| 18 01 03\* | infectious waste, not contaminated with chemicals or medicines, including single- use medical instruments (Note 1) | |
| **18 02** | **wastes from research, diagnosis, treatment or prevention of disease involving animals** | |
| 18 02 02\* | infectious waste, not contaminated with chemicals or medicines (Note 1) | |
| **20** | **MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS** | |
| **20 01** | **separately collected fractions (except 15 01)** | |
| 20 01 99 | infectious waste, not contaminated with chemicals or medicines – municipal, separately collected fractions, not from healthcare or research-related sources (Note 1) | |
| Note 1: Excluding: sharps (unless rendered unusable and unrecognisable); anatomical waste; waste known or likely to contain ACDP Hazard Group 4 biological agents; any waste from a containment level 3 laboratory; all microbiological cultures from any source; and any potentially infected waste from pathology departments and other clinical or research laboratories (unless autoclaved before leaving the site of production). | | |
| **Table S2.3 Permitted waste types and quantities for storage (AR3 & AR8) and repackaging (AR2 & AR7)** | | |
| **Maximum quantity** | | **The total annual tonnage of waste from this table accepted at the site for storage and transfer only shall not exceed 8,000 tonnes.** |
| **Waste code** | | **Description** |
| **09** | | **WASTES FROM THE PHOTOGRAPHIC INDUSTRY** |
| **09 01** | | **wastes from the photographic industry** |
| 09 01 01\* | | water-based developer and activator solutions |
| 09 01 04\* | | fixer solutions |
| 09 01 07 | | photographic film and paper containing silver or silver compounds |
| **15** | | **WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED** |
| **15 01** | | **packaging (including separately collected municipal packaging waste)** |
| 15 01 04 | | lead foils from dental care |
| **16** | | **WASTES NOT OTHERWISE SPECIFIED IN THE LIST** |
| **16 02** | | **wastes from electrical and electronic equipment** |
| 16 02 09\* | | transformers and capacitors containing PCBs |
| 16 02 10\* | | discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09 |
| 16 02 13\* | | discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12 |
| 16 02 14 | | discarded equipment other than those mentioned in 16 02 09 to 16 02 13 |
| 16 02 15\* | | hazardous components removed from discarded equipment |
| 16 02 16 | | components removed from discarded equipment other than those mentioned in 16 02 15 |
| **18** | | **WASTES FROM HUMAN OR ANIMAL HEALTH CARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTH CARE)** |
| **18 01** | | **wastes from natal care, diagnosis, treatment or prevention of disease in humans** |
| 18 01 01 | | sharps not contaminated with chemicals or medicines |
| 18 01 01 and 18 01  09 | | non-infectious sharps from vaccines delivered in mass vaccination centres, in the community and or in care homes |
| 18 01 02 | | non-infectious anatomical waste, not chemically preserved |
| 18 01 02 and 18 01  06\* | | non-infectious anatomical waste, chemically preserved, hazardous chemicals |
| 18 01 02 and 18 01  07 | | non-infectious, anatomical waste, chemically preserved, non-hazardous chemicals |
| 18 01 03\* | | infectious waste, not contaminated with chemicals or medicines (may contain sharps)  infectious anatomical waste, not chemically preserved  infectious gypsum wastes(for example, plaster casts and moulds) |
| 18 01 03\* and 18 01  06\* or 18 01 07 | | infectious waste, contaminated with chemicals infectious anatomical waste, chemically preserved |
| **Table S2.3 Permitted waste types and quantities for storage (AR3 & AR8) and repackaging (AR2 & AR7)** | | |
| **Maximum quantity** | | **The total annual tonnage of waste from this table accepted at the site for storage and transfer only shall not exceed 8,000 tonnes.** |
| **Waste code** | | **Description** |
| 18 01 03\* and 18 01  09 | | infectious waste, medically contaminated (not cytotoxic or cytostatic) – (may contain sharps)  sharps from vaccinations delivered in hospitals or GP surgeries |
| 18 01 04 | | non-infectious offensive waste- human healthcare  non-infectious gypsum wastes (for example, plaster casts and moulds) |
| 18 01 06\* | | chemicals consisting of or containing hazardous substances |
| 18 01 07 | | chemicals other than those mentioned in 18 01 06 |
| 18 01 08\* | | cytotoxic and cytostatic medicines |
| 18 01 09 | | other waste medicines, excluding cytotoxic and cytostatic medicines – human healthcare |
| 18 01 10\* | | amalgam waste from dental care |
| **18 02** | | **wastes from research, diagnosis, treatment or prevention of disease involving animals** |
| 18 02 01 | | non-infectious sharps, not contaminated with chemicals or medicines |
| 18 02 02\* | | infectious waste, not contaminated with chemicals or medicines (may contain sharps)  infectious anatomical waste, not chemically preserved  infectious gypsum waste (for example, plaster casts and moulds) |
| 18 02 02\* and 18 02  05\* and 18 02 06 | | infectious waste, contaminated with chemicals infectious anatomical waste, chemically preserved |
| 18 02 02\* and 18 02  07\* or 20 01 31\* | | infectious waste, contaminated with cytotoxic and cytostatic medicines (may contain sharps) |
| 18 02 02\* and 18 02  08 | | infectious waste, medicinally contaminated (not cytotoxic or cytostatic) (may contain sharps) |
| 18 02 03 | | non-infectious anatomical waste, not chemically preserved non-infectious offensive waste  non-infectious gypsum wastes (for example, plaster casts and moulds) |
| 18 02 03 and 18 02  05\* | | non-infectious anatomical waste, chemically preserved, hazardous chemicals |
| 18 02 03 and 18 02  06 | | non-infectious anatomical waste, chemically preserved, non-hazardous chemicals |
| 18 02 05\* | | chemicals consisting of or containing hazardous substances |
| 18 02 06 | | chemicals other than those mentioned in 18 02 05 |
| 18 02 07\* | | cytotoxic and cytostatic medicines |
| 18 02 08 | | other waste medicines, excluding cytotoxic and cytostatic |
| **20** | | **MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS** |
| **20 01** | | **separately collected fractions (except 15 01)** |
| 20 01 01 | | paper and cardboard |
| **Table S2.3 Permitted waste types and quantities for storage (AR3 & AR8) and repackaging (AR2 & AR7)** | | |
| **Maximum quantity** | | **The total annual tonnage of waste from this table accepted at the site for storage and transfer only shall not exceed 8,000 tonnes.** |
| **Waste code** | | **Description** |
| 20 01 02 | | glass |
| 20 01 31\* | | cytotoxic and cytostatic medicines – municipal, separately collected fractions not from healthcare or research-related sources |
| 20 01 32 | | other waste medicines, excluding cytotoxic and cytostatic medicines – municipal, separately collected fractions not from healthcare or research-related sources |
| 20 01 99 | | non-infectious offensive waste – municipal, separately collected fractions not from healthcare or research-related sources  non-infectious sharps, not contaminated with chemicals or medicines – not from healthcare or research-related sources  infectious waste, not contaminated with chemicals or medicines – municipal, separately collected fractions, not from healthcare or research-related sources (may contain sharps) |

# WASTE STORAGE

Storage of Hazardous waste before transfer to a more suitable disposal site will be within the building; the storage area will be over the ground floor and a mezzanine floor area as depicted in **D001 Equipment Layout & Ground Level storage & D001.1 Mezzanine Storage & Stock.** Medisort’s waste tracking system **MediTrack E007.5.9 i4 MediTrack Waste Booking & Tracking Procedure** monitors bin numbers, weights, and time on site.

Medisort works on a first in first out basis the MediTrack facilitates this process.

Storage of non-hazardous waste before transfer to a more suitable disposal site will occur in the yard within the permitted area highlighted in document **D007 i2 Littlehampton Site green line.** All containers will be closed and or covered to avoid escaping waste except while loaded and unloaded. There will be no more than 120 tonnes of Non-Hazardous waste stored on-site at any one time, and these levels are monitored by Medisort’s site waste tracking system MediTrack **E007.5.9 i4 MediTrack Waste Booking & Tracking Procedure.**

# FIRE PREVENTION MEASURES

Fire prevention measures have been formulated to support the findings from the Fire Risk Assessment **H002.10.4** and the guidance issued by the Environment Agency. These control measures shall be kept under continuous review by site management. Adherence to this Fire Prevention Plan forms the basis of Medisort's fire prevention policy. It constitutes a safe and effective working environment when enacted with the EMS and operational risk assessments.

## Control of Ignition Sources

To reduce the risk of fire-starting, ignition sources will be kept away from combustible waste; the waste on site is stored in appropriate containers.

Any ignition source, such as electrical cables and lighting, is installed and maintained by a competent person. Any ignition source is subject to a risk assessment before being sited in or around the waste material. Every shift will have a fire marshal on duty.

The following are considered potential Ignition sources:

## Arson/Vandalism

The site is not accessible by the public and has a 2-metre-high fence surrounding the site.

The site is covered by CCTV inside and outside, monitored from the processing office, and can be monitored via a phone app.

The EA does share intelligence, if they receive any, regarding the activities of any activist groups.

## Plant and Equipment

A maintenance regime and active cleaning program coupled with regular checks negate the potential of a fire starting from plant and equipment. **(H003.30 i8 Maintenance Daily Weekly Checklist, H003.32 i4 Maintenance Monthly Checklist, H003.33 i2 Maintenance Quarterly Checklist).**

## Electrical Faults

Regular inspections will be undertaken as detailed in (**H003.30 i8 Maintenance Daily Weekly Checklist, H003.32 i4 Maintenance Monthly Checklist, H003.33 i2 Maintenance Quarterly Checklist).** As a rule, power cables are located at high points and secured to the building framework.

## Smoking

No Smoking policy **(P001.11 No Smoking Policy)** is in force across the site for visiting drivers and site staff. The policy will be rigidly enforced, and an immediate ban will ensue should anyone be caught smoking away from approved areas. Dedicated smoking areas are provided outside of the permitted boundary.

The no-smoking policy also applies to “e” cigarettes.

## Reaction Between Wastes

## Typically, clinic waste is not known to react with itself or other waste streams in the in the lifetime of this site there has never been a fire that originated from the waste on site.

## Medisort uses several methods of sorting waste on site.

## Un approved wheeled bins is the most common for waste waiting to be processed via the autoclaves.

## Modified IBC ‘s for soft wastes and sharp wastes being transfer off for 3rd party disposal.

## Shrink wrapped pallets for pharmaceutical waste being transferred offsite for 3rd party disposal.

## 55-yard skips for storing non hazardous waste in the yard (180104 Offensive waste)

## 

## 

## Hot Works

No **‘Hot Works’** will be allowed to commence without the appropriate forms being processed **(H003.19 HOT PERMIT TO WORK);** personnel involved in the activity are fully briefed, and their work area is explained.

Hot works permit can only be issued by senior members of staff who have undergone the relevant training and whose names appear on the authorised personnel register. Hot works are carried away from waste in clean and prepared areas for the activity. During the operational day, hot works will be supervised by a member of staff who has previously been made aware of the conditions under which the work can commence. In all cases, the plant undergoing hot works will be left and supervised for some time before returning to active duties.

## Leaks and Spillages

During daily checks (**H003.30 i8 Maintenance Daily Weekly Checklist, H003.32 i4),** the site plant and equipment should include fluid leaks, which must be reported if found and the appropriate action taken. Fluid leaks can ignite when coming into contact with hot surfaces.

Spillages must be dealt with following the procedures set out for this event.

## The build-up of loose Debris and combustible materials

Good housekeeping is essential for health and safety compliance and averting a potential fire from accumulated materials (**H003.30 i8 Maintenance Daily Weekly Checklist, H003.32 i4)**

## Industrial heaters

It’s not Medisort’s policy to use industrial heaters on-site.

## Mobile Plant/Hot Exhausts

The only mobile plant that is used on site is a forklift which is subject to daily/shift checks (**H003.5.35 Forklift Inspection Shift Checklist)**

# SITE SECURITY

The site has a 2-metre-high fence which surrounds the site, the industrial estate has manned security which conducts patrols around the estate.

* + The site is covered by CCTV inside and outside, monitored from the plant room, and can be monitored via a phone app.
  + All visitors must be pre-booked and, on arrival, sign in on entry by reporting to the site office, where senior staff will be informed of their presence. All visitors must be accompanied around the site.
  + Contractors arriving to carry out work will undergo a separate induction**. (****H003.3 Contractor Safety Instructions and Declaration)**
  + Drivers delivering waste must be booked before arriving and stay with their vehicles if asked.

# RISKS TO NEIGHBOURING BUSINESSES

* + The site is approx. 35 meters south of BCYM and approx. 15 meters north of Dellner Ferrabyrne both are separated by roadways.
  + The closest residential neighbors are situated approximately 81 meters away from the site, with an allotment positioned in between.

# COMBUSTIBLE MATERIALS STORED ON SITE

|  |  |  |  |
| --- | --- | --- | --- |
| **Substance** | **Solid /**  **liquid/gas/powder** | **Container size(s)** | **Maximum**  **Quantity Held** |
| Gas oil (boiler fuel) | Liquid | 5000ltr x2 | 10,000ltr |
| Diesel (forklift fuel) | Liquid | 1,500ltr | 1,500ltr |
| Hydraulic Oil | Liquid | 25 ltr Drums | 250ltr |

* + There will also be a range of domestic cleaning products for general housekeeping.
  + Dedicated storage areas for flammable materials and bunded areas for chemicals and liquids.
  + Cytotoxic waste is stored close to the exit/entrance of the building.

# FIRE DETECTION ALARM

* + The site has an internal zoned fire detection system; the system includes audible alarm, heat detection, and manual call points.
  + Staff are trained to be fire vigilant, which will be covered from their induction day forward.
  + When the site is unmanned the fire alarm would be an external audible alarm. Emergency contact numbers are posted on the site contact board.

# FIRE FIGHTING

Medisort staff are not expected to put themselves in danger or at risk in a firefighting situation. Still, as a

precaution to help reduce the risk of fire spreading and assist in a life-threatening situation, Medisort plant staff and management will be trained to use handheld fire extinguishers.

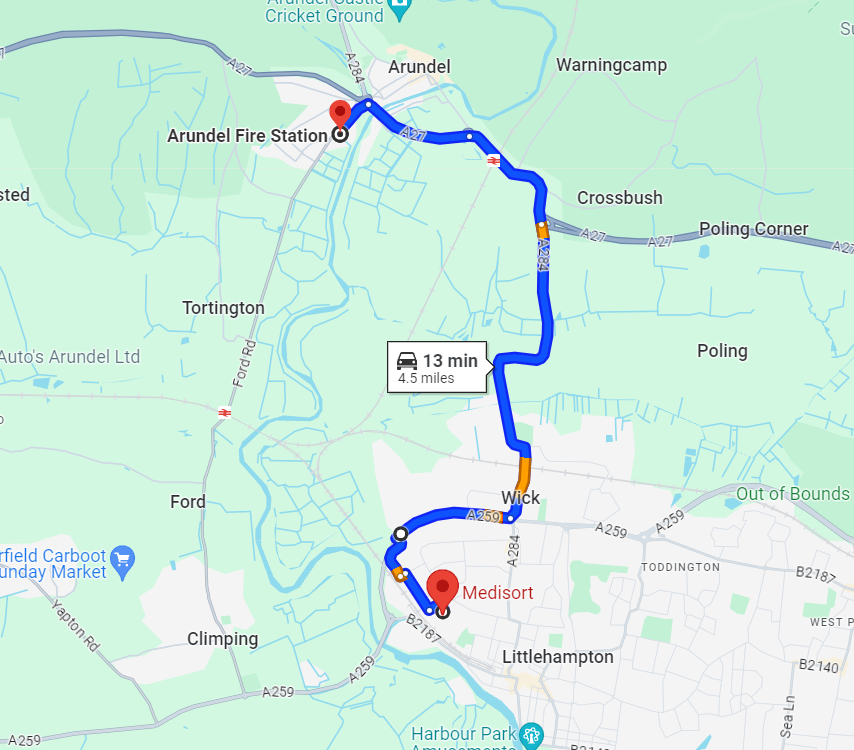
On-site Firefighting resources.

* Two floor wash down hoses are located at either end of the building which are main pressure fed.
* The waste shredder has a manual operated water feed/ sprinkler to Introduce water to the top and underneath the shredder.
* The hand lance on the bin washer could also be used to feed water on to a fire if needed.
* Fire blanket in the kitchen.

Off-site Firefighting resources.

* + Emergency services
  + The nearest Fire station is 4.5 miles by road, with a 13-minute travel time to the site.

Emergency service access will be facilitated through the A27 to Crossbush, then the A284 to Wick, followed by the A259 to Eldon Way, passing through the Lineside Industrial Estate en route to Medisort on Fort Road.



# FIRE PREVENTION

Medisort takes fire prevention seriously and understands how an uncontrolled fire could impact the local environment, residents, and our business. To assist in fire prevention at our site, we have the following measures in place.

* + Fire prevention is covered in the induction process of all new staff.
  + Fire prevention will be refreshed every 12 months via Tool-Box Talks.
  + Daily site checks **(H003.30 i8 Maintenance Daily Weekly Checklist HH, H003.32 i4).**
  + The promotion of good levels of general daily housekeeping.
  + Enforced a no-smoking policy, which includes e-cigarettes.
  + Medisort waste audit and acceptance procedures.

# STAFF TRAINING

All permanent and temporary site staff must be familiar with this Fire Prevention Plan; the following procedures are in place to achieve this.

* + Regular Tool-Box-Talks relating to selected topics taken from this FPP.
  + Management must ensure all staff know the FPP and sign an acknowledgement slip to affirm their understanding.
  + The FPP is reviewed six monthly to ensure it remains effective and relevant to activities.
  + The FPP forms part of the site induction process for new/temporary staff.
  + Regular emergency drills are enacted to create familiarity with the event of a fire and a record made of the outcome with actions for continual improvement.

The site supervisor and staff designated as the initial stage fire response team will conduct regular stress tests. The purpose is to test equipment and familiarise the team with engaging a fire at various locations around the site.

On completion of the enactment, a debriefing meeting will ensure to discuss the outcome of the enactment, how equipment is performed in certain circumstances and the comments/suggestions from those involved. Minutes will be taken of the meeting and passed to the site manager / TCM, who will act upon any recommendations.

# EMERGENCY PLAN

The following Emergency Plan will be implemented should a fire start and take hold.

# FIREFIGHTING STRATEGY

Initial firefighting/containment will be conducted by trained staff. If a fire is beyond the abilities of the trained staff, then the Fire & Rescue Services will take control.

The F&RS and/or Environment Agency will take any decision for a controlled burn as the site does not employ a Fire Safety Officer with relevant knowledge to make this decision. It is company policy for staff not to put themselves or others at undue risk.

This document has been prepared to assist the emergency services in their role and will be continually reviewed and updated upon any consultation or advances derived from industry best practices.

The site office maintains a plan detailing the location of all fire extinguishers, alarms, hose, and assembly points **D003 LH Emergency Response.** A fire extinguisher icon on the external door clearly marks buildings and containers storing fire extinguishers. Key members of staff, the site manager and shift supervisor, will assist the fire emergency services by appraising them of the prevailing situation and providing specific details such as the location of fire hydrants, on-site water sources, building layout and construction and confirmation that buildings have been evacuated and all personnel accounted for.

Detailed plans are available for the fire service in the reception area and at the rear of the building these document boxes are bright red and are clearly labelled.

# FIRE WATER MANAGEMENT

In the event of a fire, fire water would be contained by the autoclave pit (41 cubic meters), then it will be removed from the site as contaminated waste via an approved contractor following liaison with the local Environment Agency.

Medisort would use sandbags to retain any firefighting water within the building these will be deployed by Medisort staff under Instruction the Site manager, or the CoTC holder. In consultation with the emergency services on site.

Drain covers would be used to stop fire water from entering the drainage system. The plant floor and yard are made up of an impermeable surface.

# FIRE SPREAD INTERNAL

To reduce the likelihood of a fire spreading internally:

* The 770/1100/360 wheeled bins would be moved, if safe to do so from the building to the yard either by pushing them or using the forklift. This decision would be taken by the Site manager, or the CoTC holder. In consultation with the emergency services.
* Any palletised waste would be moved from the building into the yard if safe to do so. This decision would be taken by the site manager, or the CoTC holder. In consultation with the emergency services.
* The boiler would put in a controlled shut down by activating the fuel Estop.
* The Autoclaves would be put into a controlled shut down.

# FIRE SPREAD EXTERNAL

The likely hood of any fire spreading externally to other budlings, or premises is very remote due to the site being Isolated on its own plot.

# SENSITIVE RECEPTORS (Within 1 Km of the site)

# 

|  |  |  |
| --- | --- | --- |
| **Receptor** | **Direction from Site** | **Approximate Distance from Site** |
| Ladybirds Nursery | SW | 262 Meters |
| White Meadows Primary Academy | NW | 505 Meters |
| Schoolworks Academy Trust | SW | 855 Meters |
| St Catherines Catholic Primary School | NW | 923 Meters |
| Lyminster Primary School | NW | 948 Meters |
| Littlehampton Train Station | SW | 626 Meters |
| Hampton House Retirement Home | NW | 543 Meters |
| Camellots Care Home | SW | 651 Meters |
| Anchor House Residential Care Home | SW | 663 Meters |
| Brockenhurst EMI Residential Home | SW | 667 Meters |

1. **BUSINESS CONTINUITY.**

It would be very difficult within this document to foresee what would be required to get the business up and running again after a fire, this would be wholly dependent on the seriousness of the fire. We do have a 2nd permitted site in Hillingdon from which we could easily run the business from. Our IT system is backed up daily to an off-site server, so our electronic records and system Mops and MediTrack are easily accessible and are accessible remotely, including our phone lines**. (****E011.1 i3 Business Continuity** **Plan, E011 Business continuity policy)**

**Associated documents:**

**D007 Littlehampton Site green line.**

**D001 Equipment Layout & Ground Level storage.**

**D001.1 Mezzanine Storage & Stock.**

**D007 i2 Littlehampton Site green line.**

**H003.30 i8 Maintenance Daily Weekly Checklist,**

**H003.32 i4 Maintenance Monthly Checklist.**

**H003.33 i2 Maintenance Quarterly Checklist.**

**P001.11 No Smoking Policy**

**H003.19 HOT PERMIT TO WORK.**

**H003.5.35 Forklift Inspection Shift Checklist.**

**H003.3 Contractor Safety Instructions and Declaration.**

**D003 LH Emergency Response.**

**E011.1 i3 Business Continuity Plan.**

**E011 Business continuity policy.**