Crisis Management Procedure

This plan ensures that in the event of a crisis the management at Glanbia Liquid Milk will be well prepared to deal with the procedural elements in the crisis and be able to communicate quickly and efficiently with its key audiences and show that it took all possible measures to prevent the crisis.

This procedure applies to the following situations:

- Interruption of the normal operations or conduct of the business.
- Requirement for an immediate co-ordinated management response.
- When a situation has the potential to quickly focus news media and public attention on the business.

The main objectives of the Crisis Management Procedure are to ensure that the consumers are protected, that the environment is protected and that the reputation of the company is safeguarded in the event of a crisis occurring.

The procedure ensures that in the event of a crisis, the management will be well prepared to deal with the procedural elements of the crisis and be able to communicate quickly and efficiently with relevant key audiences and show that all possible measures were taken to prevent the crisis.

In the event of a crisis, people inside and outside the group will be assured that all possible action is being taken to rectify the situation and that the group is dealing with those involved in a humane and caring way and that steps are being taken to prevent recurrence of the incident.

The crisis management procedure is divided into the following sections:

1. Preventing a crisis
2. Responsibility and procedures
3. Make-up and responsibility of crisis management team
4. Arrangement for crisis control and media centres
5. Emergency contact list
6. Product recall

1. Preventing a crisis
The most effective way to prevent a crisis is to take all possible measures to avoid one happening. The following systems have been documented at Glanbia Liquid Milk to ensure good management practices, to help prevent a crisis from occurring and to detail action to be taken in the event of certain incidents:

- BRC Global Standard
- ISO9001:2000 Quality Management System
- HACCP
- Health & Safety System
These systems are audited both internally and externally on a regular basis.

The Crisis Management Procedure will be reviewed at the management review meetings and in the aftermath of a crisis, to access the adequacy of the plan and to suggest improvements, which are considered necessary.

2. Responsibility and Procedures for Identifying a Crisis
The Production Manager has been designated the Incident Coordinator for the site. When a crisis occurs the Incident Coordinator convenes the crisis management team.

The crisis management procedure has been divided into three main categories as follows:

- Product
- Environment
- Personnel

The Crisis Management Team will classify both Environment and Personnel issues as they occur. The Product Recall procedure is outlined in section 6.

3. Make-up and Responsibilities of the Crisis Management Team
The crisis management team is set up to handle a specific situation and has the authority to handle that situation. The core members of the crisis management team are as follows:

- **Crisis Coordinator:** Production Manager
  - **Responsibility:** To coordinate all relevant procedures in the event of a crisis. To ensure that the Crisis Management Procedure is followed. To ensure that the control centre is in place. To contact the Risk Manager in Glanbia House re the Insurance Situation.

- **Crisis Secretary:** Quality Manager
  - **Responsibility:** To document all information gathered by the Crisis Management Team along with the date, time and provider of the information. To minute all decisions/actions approved in an incident log. To be aware of the movements of the crisis management team during the crisis. To prepare a post-crisis report. To ensure that all necessary equipment is located at the crisis management control centre. To manage document control of the crisis management plan. To update the Emergency Contact List every 6 months.

- **Chairman:** Plant Manager
Responsibility: To maintain management with senior management and board as appropriate. To ensure that all decisions are coordinated and information/decisions are communicated to the relevant personnel, which must include the Operations Director, Marketing Director and the Logistics Director.

Corporate Affairs: Corporate Affairs Manager
Responsibility: To manage media and communication activities and to liaise with senior management to determine requirements in respect of the media and other key audiences of the group.

The inclusion of Human Resources, Legal, Public Relations and other functions in the team will be determined, as appropriate, by the nature of the crisis being addressed.

4 Arrangements for Crisis Control and Media Centres
The Meeting Room has been designated the control centre in the event of a crisis. In the event of this meeting room being unavailable due to the circumstances of the particular crisis the Plant Managers Office will be utilised.
It is the responsibility of the Crisis Secretary to ensure that the necessary equipment (computers, phones, relevant procedures, etc.) is available at the designated location.

5. Emergency Contact List

<table>
<thead>
<tr>
<th>AREA</th>
<th>NAME</th>
<th>DAY</th>
<th>MOBILE</th>
</tr>
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<tbody>
<tr>
<td>Group</td>
<td>Colin Gordon - CEO</td>
<td>01-4881088</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Frank Tobin - Operations Director</td>
<td>01-4881081</td>
<td>087-2606081</td>
</tr>
<tr>
<td></td>
<td>Ger Cadogan – Technical Manager</td>
<td>01-4881040</td>
<td>087 2451694</td>
</tr>
<tr>
<td></td>
<td>Joseph Collum – Marketing Manager</td>
<td>01-4881083</td>
<td>086-2425565</td>
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<tr>
<td></td>
<td>Ger Mc Grath – Sales Director</td>
<td>01-4881086</td>
<td>087-2586847</td>
</tr>
<tr>
<td></td>
<td>Geraldine Kearney-Communications</td>
<td>056-7772200</td>
<td>087-2319430</td>
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<tr>
<td></td>
<td>Bill Bergin, Risk Manager</td>
<td>056-7772216</td>
<td>087-2273861</td>
</tr>
<tr>
<td></td>
<td>Ger Devin, Costumer Services</td>
<td>01-4881000</td>
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<tr>
<td>Ballytore</td>
<td>Fergus O’Sullivan – Plant Mgr</td>
<td>056-7723179</td>
<td>087-2906107</td>
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<tr>
<td></td>
<td>Nigel Allen – Production Mgr</td>
<td>056-7723179</td>
<td>087-2589602</td>
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<td></td>
<td>Niall Gosling – QA Manager</td>
<td>056-7723179</td>
<td>087-0506421</td>
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<tr>
<td>Company</td>
<td>Name</td>
<td>Phone 1</td>
<td>Phone 2</td>
</tr>
<tr>
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<tr>
<td>QP8</td>
<td>Bill Maher - Dept. of Ag.</td>
<td>045-521200</td>
<td>086-8343683</td>
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<tr>
<td>Drogheda</td>
<td>Tony Nash - Plant Mgr</td>
<td>041-9838771</td>
<td>087-6789178</td>
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<td></td>
<td>Paddy Cotter - Production Mgr</td>
<td>041-9838771</td>
<td>087-2892906</td>
</tr>
<tr>
<td></td>
<td>Hugh King – QA Manager</td>
<td>041-9838771</td>
<td>087-2394519</td>
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<td></td>
<td>Pat Cannon - Dept. of Ag.</td>
<td>087-9147427</td>
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<tr>
<td>Snowcream</td>
<td>Liam Neville - Plant Mgr</td>
<td>051-874885</td>
<td>087-2578617</td>
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<td></td>
<td>Ray Halley - Production Mgr</td>
<td>051-874885</td>
<td>086-8095097</td>
</tr>
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<td></td>
<td>Eve Nolan – QA Manager</td>
<td>051-874885</td>
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<tr>
<td></td>
<td>David Tantrum - Dept. of Ag.</td>
<td>051-832501</td>
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<tr>
<td>CMP</td>
<td>Pat Collins</td>
<td>-</td>
<td>086-2424347</td>
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<tr>
<td>Sales</td>
<td>Niall Duggan</td>
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<td>086-1922094</td>
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<td></td>
<td>Fintan Reddy – Sales Manager</td>
<td>01-4881170</td>
<td>087-2623873</td>
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<td>Pat Fogarty - Multiples</td>
<td>-</td>
<td>087-2772226</td>
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<td>Paul Flynn - Agents</td>
<td>-</td>
<td>087-9036431</td>
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<td></td>
<td>Ger Devin - Symbols</td>
<td>-</td>
<td>087-2518339</td>
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<td></td>
<td>Sean Lordan</td>
<td>-</td>
<td>086 856 2255</td>
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<tr>
<td></td>
<td>Yvonne Farrell- EOOH</td>
<td>-</td>
<td>087-2865740</td>
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<tr>
<td>Authorities</td>
<td>FSAI</td>
<td>01-8171300</td>
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<td></td>
<td>Dept. of Ag.</td>
<td>01-6072000</td>
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<tr>
<td>Customers</td>
<td>Tesco – Bill Paterson (1st point of contact)</td>
<td>01-2152011</td>
<td>086-8315611</td>
</tr>
<tr>
<td></td>
<td>Tesco- Lucy O’Neill</td>
<td>01-2152385</td>
<td>086-3850148</td>
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<td></td>
<td>Dunnes Stores – Collette Curron</td>
<td>01-4751111</td>
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<td>Superquinn – John McGlennan</td>
<td>01-8325700</td>
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<tr>
<td></td>
<td>Centra – Sharon Buckley</td>
<td>021-961601</td>
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<tr>
<td></td>
<td>BWG – Barry Tyndall</td>
<td>01-4090412</td>
<td>086-8191066</td>
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<td></td>
<td>Londis – Terry O’Brien</td>
<td>01-4540688</td>
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<td>Pettits – Siobhan O’Keeffe</td>
<td>053-24055</td>
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<td>Esso – Sean Coughlan</td>
<td>01-2881661</td>
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<td></td>
<td>Campbells – Tom Crossan</td>
<td>01-6776761</td>
<td></td>
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</tbody>
</table>
6. Product Recall

A product recall can arise from the production of unsafe, illegal or non-conforming product and threats to products. Events that can trigger a product recall include:

- Malicious contamination
- Product sabotage
- Attempted extortion
- Glass breakage
- Chemical contamination of an ingredients or product
- Significant process deviations
- Blood spillage
- Significant errors in recipe make up
- Product code/label issues
- Microbiological results

Procedure to be followed during a Product Recall is as follows:

- The first step is that information is received from a source e.g. the marketplace, QA/Production Department, Agents, Depots, Multiples, Shops, Food Safety Authority, Dept. of Agriculture, etc. This information is disseminated and crosschecked. The Production Manager convenes the Crisis Management Team. The QA Manager opens an incident log.
- From the information received a product traceability study is carried out. To carry out a proper product traceability the following information can be retrieved from each product: product details, production day, time and machine; use by date. The amount of unsafe product on the market and the customer outlets selling the unsafe product are determined.
- Samples are obtained from the complainer or source ASAP. These samples are examined and compared with library samples from the same production run.
- A risk analysis is carried out of the situation and based on the results of one of the following is carried out:
  
  Quality recall
  - If risk analysis of the situation, based on the results of the investigation, shows that there are no food safety issues and that the product brand is not affected, the Plant Manager informs the Operations Director, suspends distribution of the product and authorises a quality recall. The terminology for the communication of a quality recall is to be agreed between the Plant Manager and the Commercial Director/Marketing Manager. Receptionists and Customer Services Centre must be fully briefed.

  Product recall
  - If risk analysis of the situation, based on the results of the investigation, shows that there is a food safety issue and the product is still within our distribution chain, the Plant Manager informs the Operations Director, suspends distribution of the product...
and authorises a product recall. A product recall requires notification within the company and the distribution chain. The terminology for the communication of a product recall is to be agreed between the Plant Manager and the Commercial Director/Marketing Manager. Receptionists and Customer Services Centre must be fully briefed.

Product withdrawal

- If risk analysis of the situation, based on the results of the investigation, shows that there is a food safety issue and the product is no longer within our distribution chain, the Plant Manager informs the Operations Director, suspends distribution of the product and authorises a product withdrawal. A product withdrawal requires notification within the company, the distribution chain, the FSAI and consumers. The terminology for the communication of a product withdrawal is to be agreed between the Operations Director and the Commercial Director/Marketing Manager. Group Communications, Geraldine Kearney, is responsible for issuing consumer product recall notices, trade product recall notices, and press releases. Receptionists and Customer Services Centre must be fully briefed.

- To facilitate the smooth operation of product recall or product withdrawal, agreed terminology for the product recall or product withdrawal is to be communicated by the Plant Manager to the distribution office of manufacturing site and Customer Services Centre Manager:

  - Distribution Office
  - CSC
  - Depots/Agents/Superroutes
  - Dublin deliveries and PDR routes

- The Distribution Office is responsible for recalling or withdrawing product from Depots/Agents/Superroutes while the Dublin Depots are responsible for recalling or withdrawing product from Dublin deliveries and PDR routes.
- Recovered product must be returned to designated recovery site and must be stored in a separated area. Accurate records must be kept of the amounts of recovered product and recovered product must be destroyed under the supervision of management.
- Quality recalls, product recalls and product withdrawals must be formally closed, reviewed and a final report written.
- Each manufacturing site carries out a mock Product Recall two times per year (ref QL1).
EMERGENCY PROCEDURES

The purpose of emergency procedures is to provide quick and effective handling of emergency situations that can arise and to minimise the effects of such emergency situations on the environment. The emergency procedures covered as part of this procedure are as follows:

- **EP10.1** Emergency Spillage Procedure.
- **EP10.4** Chlorine Gas Leak Emergency Procedure.
- **EP10.5** Fire Emergency Procedure.
- **EP10.6** Unforeseen Emergency Procedure.
- **EP10.7** Resumption of work

Other procedures in relation to crisis situations are detailed in the Crisis Management Policy QP8. Emergency contact details for each plant are contained in the Environmental Lists EL01B/D/S.

Laminated copies of this Emergency procedure EP10 carry the same revision no and date and are located in the following areas:

1. Reception
2. Security
3. Canteen
4. Milk Intake
5. Process floor
6. Laboratory
7. Maintenance workshop
8. Packing floor
9. Chill
10. General stores
11. Administration/Offices
12. Boiler house
13. Effluent Plant (Ballitore)
EP10.1 EMERGENCY SPILLAGE PROCEDURE

In the event of spillage due to:
(a) Vehicle collision
(b) Silo/Tanker collapse
(c) Human error
(d) Explosion
(e) Leakage.
(f) Accident

1. The Shift Manager is to be informed in the first instance. He will then contact the Emergency Services if deemed necessary and notify the Plant Manager as required. A member of maintenance must be notified immediately and requested to block the main drain and if necessary turn off all water, ESB and Gas into the plant.

2. The Plant Manager will inform the Local Authority if the situation so warrants.

3. In all circumstances, trained personnel must remain at the site of the spillage.

4. If necessary, protective clothing is to be worn.

5. Warning signs are to be placed in position as appropriate.

6. Area to be cordoned off and ensure vehicles and people are to be kept away from the spillage.

7. In the case of spillage from a vehicle, move the vehicle to another spot if possible if this will make the spillage cause less harm or damage.

8. Never leave the spillage unattended.

9. In the event of sand or other suitable material being available, block the spread of spillage to drains, etc.

10. If the spillage occurs outside the premises, the relevant Emergency Services should be notified.

11. In the event of a spillage affecting neighbouring property the relevant people will be informed as soon as possible by the Plant Manager.

13. In all cases of spillage, the Incident Log (QF 24) must be completed and all available information recorded.

14. Incident Log Forms are to be maintained by the Environmental Representative at each site.
1. In the event of a leakage of Natural Gas, the gas detection equipment in Drogheda will detect it and will automatically shutdown the boiler. In Snowcream the maintenance staff will immediately turn off all gas to the site.

2. The following persons shall be notified as quickly as possible:
   (a) Engineering or Maintenance Supervisor.
   (b) Shift Manager.

3. Ensure that no one is in immediate danger. Evacuate staff as per the Fire Evacuation procedure (section 10.5).

4. Contact the gas company at the emergency no. listed below:
   Gas leak (24 hour) 1850 20 50 50.

5. If a fire starts, call the fire brigade.

6. When the situation is contained, Engineering or Maintenance Supervisor must satisfy himself that:
   (a) The situation is under control.
   (b) That no immediate danger to personnel or equipment exists.
   (c) That senior management are fully informed.
   (d) That a responsible person is left in charge.
   (e) That the Incident Log (QF 24) is completed.
EP10.3 EMERGENCY PROCEDURE
IN EVENT OF A REFRIGERANT LEAK.

1) In the event of a leakage of refrigerant,
   One of the following persons shall be informed as quickly as possible: -

   (a) Engineering Supervisor / Maintenance Supervisor
   (b) Shift Manager
   (c) Site Environmental Representative

2) Isolate the vicinity of the leak. Put on breathing apparatus and close any relevant valves.

3) Ensure that no one is in immediate danger. Should it be necessary after analysing the situation, evacuate staff as per Fire Evacuation procedure (EP10.5).

4) If necessary call the emergency services.

* Because of the dangers to people from an ammonia leak, it has been decided in our Snowcream site not to get any member of staff involved in dealing with the clean up, but to call the fire brigade and South Eastern Refrigeration, who are both located within 10 minutes of the factory. Therefore if a leak occurs at Snowcream the following procedure is to be followed:

   1) If a leak occurs during maintenance switch off the compressor and get out of the room.
   2) Close the shut off valves on the reservoir outside the room. The valves are marked with red paint and laminated sheet marked ‘shut off valve’.
   3) Notify a member of management immediately who will contact the crisis co-ordinator.
   4) If he deems it necessary, the emergency alarm will be activated and the evacuation plan implemented.
   5) If necessary South Eastern Refrigeration and/ or the fire brigade will be called.

   In the event of a spillage:
   a) Evacuate the building immediately.
   b) Close the shut off valve on the effluent discharge.
   c) Notify the fire brigade.

5) If water is used to contain the spillage, it may contaminate the surface water drains. In the event of this possibility the Plant Manager will notify the local authority.

6) All spillages shall be contained as far as possible i.e. drains blocked and product collected into containers.

7) When the leak is finally contained, before leaving the site, the Crisis Coordinator in liason with the Engineering supervisor must satisfy himself that:

   (a) The situation is under control.
(b) That no danger to personnel or equipment exists as a result of the leak.
(c) That senior management have been informed.
(d) That a responsible has been left in charge.
(d) That the Incident Log (QF 24) is completed.

EP10.4 EMERGENCY PROCEDURE

IN EVENT OF A CHLORINE GAS LEAK

1. In the event of a serious leakage of chlorine, one of the following persons shall be informed as quickly as possible: -
   (a) Engineering and/or Maintenance Supervisor
   (b) Shift Manager
   (c) Site Environmental Representative

2. Get away from the affected area and remove any clothing that has been splashed with liquid.

3. Isolate the vicinity of the leak.

4. Put on breathing apparatus and close valves on chlorine bottles

5. Leave door open until room is clear of gas.

6. If water is used to contain the spillage, it may contaminate surface water drains. In this event, the Plant Manager will notify the Local Authority.

7. When the leak is finally contained, before leaving the site, the Engineering and/or Maintenance Supervisor must satisfy himself that: -
   (a) The situation is under control
   (b) That no danger to personnel or equipment exists.
   (c) That a responsible person is left in charge.
   (d) That the Incident Log (QF 24) is completed as required.
EP10.5  EMERGENCY EVACUATION PROCEDURES
IN THE EVENT OF A FIRE.

General Procedures - Employees: -

1.  If a fire starts in your area:
   (a). Sound the fire alarm.
   (b). If safe to do so, and without placing yourself in danger, tackle the fire with a suitable extinguisher.
   (c)  If fire cannot be brought under control within a reasonable time, leave the premises closing any doors behind you. Make note of the exact location and the material involved.
   (d)  Report to your assembly point and notify your warden of all the facts.

2.  On hearing the alarm:
   (a)  Turn off non-essential machinery e.g. fork trucks. 
   (b)  You must leave the building by the nearest safe exit.
   (c)  You should walk, not run.
   (d).  You must go to your assembly point.
   (e).  You must stay at your assembly point until you are told that you may leave.
   (f).  You must not collect any possessions from another area.
   (h).  You must not, under any circumstances return to the building until you are told to do so.

   Note: First Aid can be obtained at the Assembly Point.

3.  Contact the Emergency Services. When the Reception/Switch board is closed, the designated Head Warden or Deputy should make the call.

4.  If contaminated waters used to fight fire is allowed through surface water drains, the Plant Manager should notify the Local Authority.

5.  When the fire is extinguished, the Engineering and / Maintenance Supervisor must satisfy himself that:
   (a)  The situation is under control.
   (b)  That no immediate danger to personnel or equipment exists.
   (c)  That senior management are fully informed.
   (d)  That a responsible person is left in charge.

6.  Fill out the Incident Log (QF 24).

Head Warden and Deputy Head Warden

1.  On the alarm being activated, you MUST:
   (a)  Call the Emergency Services at any time when the Reception/ Switch board is closed.
   (b)  Take up a position at the designated Head Warden point.
   (c)  Issue the assembly point registers.

2.  A number of personnel will be reporting to you.
   (a)  First-Aid personnel will report that they have vacated the premises and are ready to attend to any injuries.
Environmental Procedures EP10

Cont’d EP10.5

(b) The Assembly Point Wardens will report to inform you that all personnel listed have attended their Assembly Points and have been accounted for the names and last known whereabouts of any persons/s who is/are missing.

(c) Information on the location of the fire and extent is made known to you by the Warden in the area the fire started.

3. On the arrival of the Fire Brigade, you must inform the Senior Fire Officer in attendance of the following:

   If all personnel are accounted for, or the last known whereabouts of any person missing.
   
   (b) The electrical status of the premises.
   
   (c) The exact location of the fire and whether chemicals are involved, and at the same time handing over the Fire Plans of the Premises.
   
   (d) Attend the scene of the fire along with the Fire Brigade and assist with any information required.

4. At the earliest convenient time, the Plant Manager and Production Manager must be informed of the situation.

On hearing the alarm the engineer MUST:

1) Switch off the main gas valve,
2) Switch off the main electricity and water valve if it is safe to do so,

Receptionist:

On the alarm being activated, you MUST:

(a) Telephone the Fire Brigade.
(b) Leave the premises by the nearest safe exit.
(c) Go to your assembly point.

Assembly Point Wardens

First Warden

1. On the alarm being sounded you MUST:

   (a) Leave the premises by the nearest Safety Exit.
   (b) Go to your Assembly Point.
   (c) On the arrival of personnel designated to attend your assembly Point, take a roll call.

2. On completing the roll call, you MUST report to the Head Warden that:-

   (a) All personnel are accounted for and/or
   (b) The names and last known whereabouts of any persons/s who is/are missing.
   (c) Any factual information, which you may have about the fire.

   It is the duty of ALL Wardens to refuse admission of any personnel to the premises on any pretext whatsoever. Special procedures are set out for the closing down of certain plant and equipment, these procedures will be followed if it is safe to do so.
Cont’d EP10.5

First-Aid Personnel

On the alarm being activated, you **MUST if it is safe to do so:**

(a) Collect the Portable Emergency First-Aid Kit.
(b) Leave the premises by the nearest safe exit.
(c) Report to the Head Warden stating that you have vacated the premises and are ready to attend to any casualties.
(d) Go to the Assembly Point.

EP10.6  EMERGENCY PROCEDURE

IN EVENT OF UNFORSEEN EMERGENCIES

In the event of the occurrence of an emergency not yet anticipated by Glanbia Dairies, Drogheda, Ballitore & Waterford, the following guidelines should be followed at all times:

1. In the first instance, contact the Engineering and/or Maintenance Supervisor. Inform the Shift Manager and/or Department Manager as quickly as possible.
2. Ensure that no one is in immediate danger. Clear people from affected areas.
3. If necessary, contact the emergency services.
4. Take whatever action possible to prevent injury / adverse affect to the environment.
5. The Plant Manager shall inform the local authority if breach of any legislation is involved.
6. The Incident Log (QF 24) is to be completed.

EP10.7  RESUMPTION OF WORK
Once an emergency situation has occurred where the fire department is called on site to deal with the emergency, the fire officer in charge makes the decision when it is safe to re-enter the building.

In the event of structural damage to a part of a building, site management may require the maintenance manager aided by a construction engineer to assess whether to allow employees to re-enter (Project Management will be the construction engineers used). When it is safe to return to the building, the fire Officer will inform the fire warden in charge of the evacuation area in conjunction with the management team on site that it is safe for normal business to commence.

In the event of the emergency situation being dealt with in-house, the chief fire warden on site will make the decision as to when it is safe to return to work. This will be based on the best advice available from the maintenance manager and the maintenance team. If need be areas are cordoned off or additional expertise is called. Additional expertise may come from: fire officer, Water Technology, Ellis & Everard, An Bord Gais, EPA, Local authority.

In order to resume normal production, the crisis management team will meet to decide whether full production will resume on site. If unable to do so, arrangements for the removing of production to another Glanbia site will be organized. This may involve machinery or personnel being transferred to the said plant.