

Our Ref: 77944.1

Your Ref:

London | Cambridge | Oxford | Hong Kong | Singapore

**FOR THE ATTENTION OF MR PAUL
WILLIAMS**

Angus International Safety Group
Station Road
High Bentham
Nr Lancaster
LA2 7NA

14 January 2024

BY EMAIL ONLY
(PAUL.WILLIAMS@AISAFETYGROUP.COM)

Dear Angus International Safety Group

Our client: Cleaner Bentham Limited

We act for Cleaner Bentham Limited.

We refer to the correspondence between Mr Paul Williams, Managing Director of Angus International Safety Group (**AISG**) and our client from July 2024 to date regarding possible environmental harm and health risks associated with per-and poly fluoroalkyl substances (**PFAS**) used at the Angus Fire Ltd (**Angus Fire**) site in Bentham (the **Site**).

We understand that the Site has been used by an "Angus Fire" business to manufacture and test aqueous film-forming foams (**AFFF**) that contained PFAS and PFAS-containing fluorochemicals and fluorosurfactants since 1976. We understand that AISG acquired the business in 2013, along with US based AFFF manufacturer, National Foam. Angus Fire describes itself as a global leader in firefighting technology. In your 27 June 2024 update to the Town Council, you state that you are "*committed to protecting the health and safety of [your] employees, neighbours, and the environment*" and that you are "*not a company to avoid our responsibilities*" and that you have "*always operated [the] site in accordance with Environmental [sic] Agency regulations*".

The risks to human health associated with PFAS have been known for many years. The scientific literature on the subject is vast, and the gaps in regulation well known. As a global leader in firefighting technology and a responsible business, we expect that you will have been aware of the risks and the developing research, and have been taking pro-active steps to protect your employees, the local community and those who use your products. Indeed, in your letter to our client on 22 July 2024, you stated that you are "*working urgently, and indeed [have] been doing so for a number of years, to establish the extent of any PFAS contamination*".

Our client is concerned about the level of contamination, and not only how AISG intend to deal with it now, but how it has sought to ensure the safety of the community throughout its ownership of the Site. As a responsible employer and member of the community, our client asks that you promptly respond to the questions set out below.

Site management and testing

1. Confirm what you have been doing "*for a number of years*" to establish the extent of any PFAS contamination and provide the results of those investigations;
2. Confirm why you were undertaking those investigations;
3. Confirm what advice you have received and from who as to the management and disposal of PFAS on site;
4. Confirm whether any remediation works have been undertaken previously;
5. Explain why, if you have been working for a number of years on the issue, it appears that initial testing has only just been undertaken;
6. Explain why, in 2013 when URS Infrastructure and Environmental UK limited undertook an environmental assessment of the entire site in 2013 in light of the acquisition by LDC (Managers) Ltd, no analysis was undertaken for surfactants (anionic and non-ionic) or PFAS to identify potentially hazardous compounds commonly used in firefighting foam;

Community and employee health and safety

7. Explain how you have sought to fulfil your duties under Sections 2, 3 and 6 of the Health and Safety at Work Act 1975 from 2013 to date;
8. Confirm whether you have undertaken any health monitoring on your current or past employees, considering the risks of PFAS to human health have been well known for years;
9. Confirm which of your products contain PFAS chemicals currently and historically, detailing which chemicals are or were used in each, and when those products were manufactured and tested;
10. Confirm when you stopped manufacturing products containing PFAS chemicals;
11. Confirm how you disposed of manufacturing and testing waste products;
12. Explain what the lagoons currently being investigated by the Environment Agency were used for over the course of their lifetime, and what they are used for now;
13. Confirm your current understanding of the risks to human health, animal life and the environment posed by the manufacture and use of C6 based foams (which we understand Angus Fire still produces and sells), and provide the evidence that underpins that understanding, including any studies undertaken by AISG;
14. If AISG has not conducted its own studies into the effects on human health, animal life, and the environment of C6 based foams confirm whether it intends to do so;

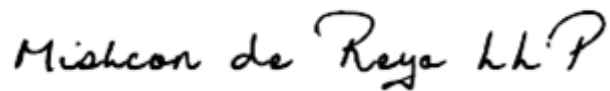
Future action

15. Confirm what further testing and remediation you intend to undertake, and in what timeframe;

16. Confirm what steps you will take to ensure the welfare of the local community;
17. Confirm whether you will commit to funding blood testing in the local community, and if not, why not;
18. We understand that you have approached members of the community with offers to purchase their land. Please confirm whether this is in fact the case, and whether you intend to fund independent legal advice for those you have approached.

We look forward to your response no later than 31 January 2024.

Yours faithfully

A handwritten signature in black ink that reads "Mishcon de Reya LLP". The script is cursive and fluid, with the letters "M", "R", and "P" being particularly prominent.

Mishcon de Reya LLP

Direct Tel: +44 (0)20 3321 7128

Email: emily.nicholson@mishcon.com