

Aussie Recycling

Pollution Incident Response Management Plan *Procedures for Notifying Incidents (Extract)*

IMPORTANT NOTE: This document is an extract of the Aussie Recycling PIRMP as required by Part 3A of the Protection of the Environment Operations (General) Regulation 2009



1. Introduction

The holder of an environment protection licence (EPL) is required to prepare and maintain a Pollution Incident Response Management Plan (PIRMP), as per Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act). This requirement was added in 2011, via the Protection of the Environment Legislation Amendment Act 2011 (POELA Act). Prior to this, licence holders were still required to notify pollution incidents that would, or were likely to, cause material harm to the environment; however, they were not required to prepare and maintain a specific plan to mitigate risk. In addition to preparing the PIRMP, the licence holder must keep a copy of the plan at the premises (Section 153D) and 'test' the plan in accordance with the Protection of the Environment Operations (General) Regulation 2009 (POEO Regulation).

The Aussie Recycling PIRMP (the Plan) works with and is complementary to:

- The Pollution Incident Response Procedure (the Procedure);
- The Plan of Management (POM); and
- The Site Safety and Environmental Rules and Site Induction.

These documents establish the framework that helps protect the environment, as well as the health, safety and well-being of all persons and stakeholders associated with the Aussie Recycling site.

In preparing and reviewing the Plan, it is important to reiterate the definition, objectives and purpose of the Plan, as detailed in the NSW EPA Environment Guidelines: Preparation of pollution Incident Response Management Plans 2012 (the Guidelines). This serves to reinforce to all personnel, the importance and role of the PIRMP.

1.1. Definitions

As per the definition in the POEO Act dictionary, a 'pollution incident' is:

"an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise."

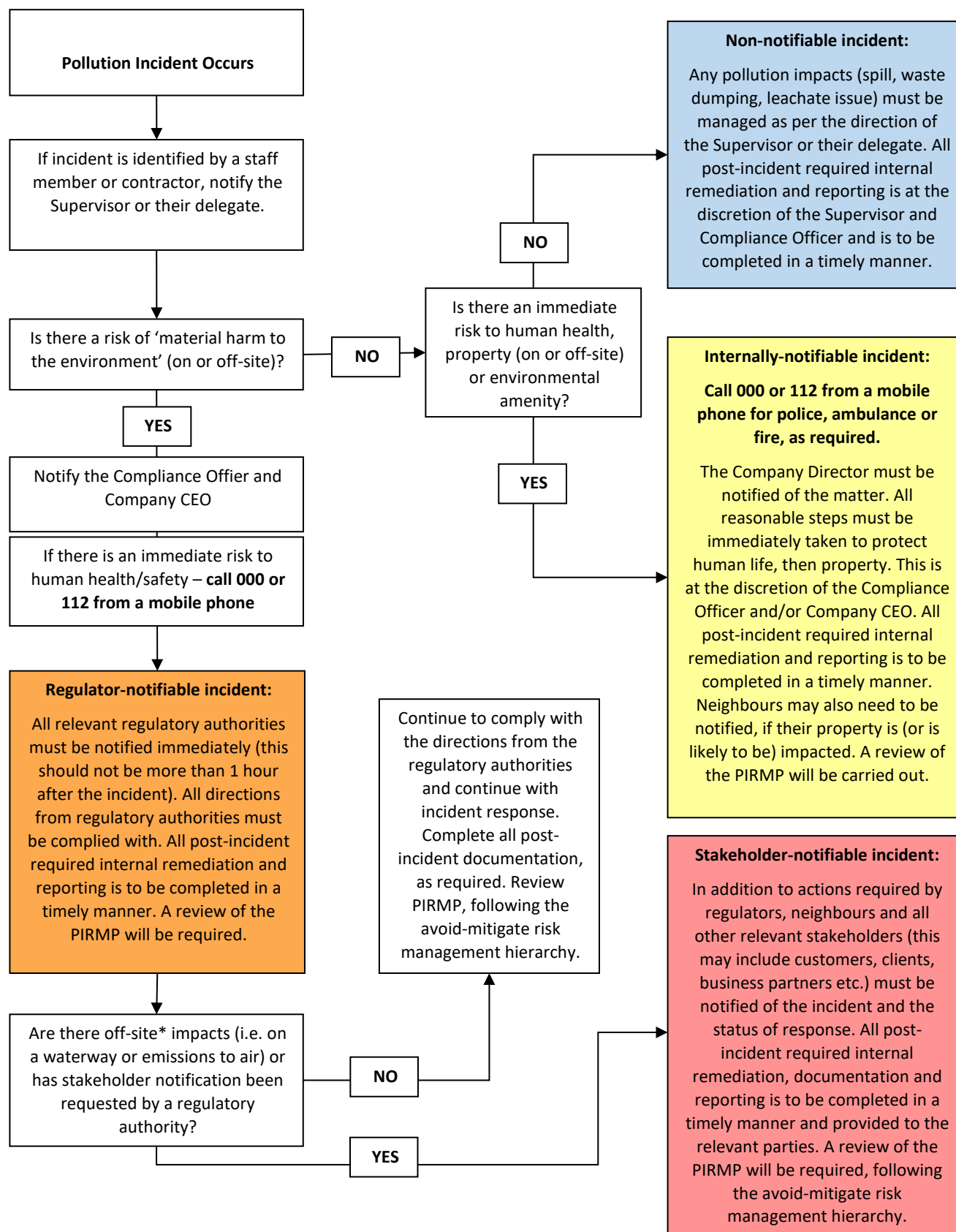
As per Section 148 of the POEO Act, notification of a pollution incident must occur if *"material harm to the environment is caused or threatened"*. 'Material harm' is defined in Section 147 of the POEO Act as:

- a) *"harm to the environment is material if:*
 - i. *it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
 - ii. *it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and*
- b) *loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.*

2) *For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs."*

Therefore, **not all pollution incidents are notifiable**. This is made clear in the flow chart on the following page.

2. Pollution incident response flowchart



3. Notification Details

Communication with regulators and management authorities

There are several regulators and management authorities who may need to be notified in the event of a regulator-notifiable incident. These stakeholders are shown in the table below.

Table 1 - Authority contacts that requiring notification during a pollution incident

Authority	Description	Contact information
NSW Environment Protection Authority (EPA)	Main environmental regulator for sites with an EPL	131 555
Strathfield City Council	Local government environmental regulator	9748 9999
NSW Ministry of Health	Camperdown public health unit	02 9515 9420
SafeWork NSW	WHS authority	13 10 50
Fire and Rescue NSW	Emergency services – fire, hazardous materials etc.	1300 729 579 (or 000)

Communication with emergency services and senior management

The following tables lists emergency services and senior management staff that may need to be contacted in the event of an incident.

Table 2 - Contact details for persons and organisations relevant to pollution incident and emergency response

Contact	In case of...	Number
CEO (Emmanuel Roussakis)	Any pollution incident or potential pollution incident or emergency	0422 266 772
Site Operations Manager (Leon Roussakis)	Any pollution incident or potential pollution incident or emergency	0422 266 772
Emergency services (Ambulance, Fire, Police)	Time-critical life or property threatening emergencies	000 or 112 from mobile
State Emergency Service	Assistance required in recovering from storm events	132 500
Lakemba Fire Station	Assistance with fire or pollution incident response	02 9759 5252
Strathfield Police Station	To report non time-critical crime, such as vandalism or illegal dumping	02 9746 7084
Telstra Call Connect (Telstra phones only)	For connection to key contacts and phone numbers	1234
Sydney Water	Pollution of drinking water	13 20 90

Communication with neighbours and other stakeholders

Pre-emptive consultation with stakeholders

Ongoing consultation with all stakeholders in the development can help to ensure that problems are identified and addressed in a timely fashion. For external stakeholders, this can avoid misunderstandings which could expose the company to litigation or result in negative publicity. For internal stakeholders, this can increase productivity and reduce the incidence and severity of injuries. Ongoing consultation methods which are utilised include site 'toolbox' talks, training, and personal phone calls where relevant.

Stakeholder notifiable incident

When it is necessary, neighbours and external stakeholders will be promptly notified of a pollution incident. The extent of notification will be at the discretion of the Company Director, unless otherwise directed by a relevant regulator or management authority. The table below details relevant stakeholders and information pertinent to making a decision on whether notification is required.

Notification must include any specific information that could be provided to the community so it can minimise the risk of harm. For example, this could include instructions to close windows and doors and remain inside for incidents involving emission of air pollutants.

Stakeholder	Likely to be affected by	Contact information/method
Nearest receivers	Harmful or nuisance emissions to surface water (off site), groundwater or air.	Personal visit, phone call or prompt letter drop, social media
Immediate neighbours	Harmful or nuisance emissions to surface water (off site), groundwater or air.	Personal visit, phone call or prompt letter drop, social media.
Wider community/distant neighbours	Harmful emissions to surface water (off site), groundwater or air (that is likely to expand into the wider community).	Prompt letter drop, social media.
Clients (i.e. recycled material purchasers)	Pollution events that result in the contamination of material or closure of the site.	See relevant client website/directory listing for office contact details – phone call, social media.
Contractors or other internal stakeholders not on site	Pollution events that result in the closure of the site.	Various – phone call, social media.
Business partners/investors	Pollution events that are likely to result in negative publicity for the business, regulatory action or closure (permanent or temporary).	Various – phone call.