



1.0 Introduction

The Protection of the Environment Legislation Amendment Act 2011 (PELA) received assent on 16 November 2011 resulting in changes to the Protection of the Environment Operations Act 1997 (POEO Act). The intent of the PELA is to improve the way pollution incidents are reported and managed. Provisions include a requirement for holders of Environmental Protection Licences (EPLs) to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP). The specific requirements for PIRMPs are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation). In summary, this legislation requires the following:

- Holders of EPLs must prepare a Pollution Incident Response Management Plan (section 153A, POEO Act);
- The plan must include the information detailed in the POEO Act (section 153C) and the POEO(G) Regulation (clause 98C) and be in the form required by the POEO(G) Regulation (clause 98B);
- Licensees must keep the plan at the premises to which the EPL relates (section 153D, POEO Act);
- Licensees must test the plan at least every 12 months and after a pollution incident in accordance with the POEO(G) Regulation (clause 98E); and
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened within the meaning of Part 5.7 of the POEO Act, licensees must immediately implement the plan (section 153F, POEO Act).

As the holder of an EPL, North Rocks is required to comply with the POEO Act; as such, this document has been developed to satisfy the PIRMP requirements documented above.

This document also details the procedures for notification of pollution incidents resulting in or having the potential to cause material harm to the environment. The notification of environmental incidents under this PIRMP is only required for those incidents causing or threatening to result in material environmental harm (a material harm incident) as defined in the POEO Act.

1.2 Definition of a Pollution Incident

A pollution incident is defined in the POEO Act as 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.

1.3 PIRMP Content Requirements

The content requirements for the PIRMP are outlined in Section 153C of the POEO Act and have been included in Table 1 below.

Table 1 PIRMP Content Requirements and Location

Section 153C	Content Requirements	Relevant Section of PIRMP
(a)	The procedures to be followed by the holder of the relevant EPL in notifying a pollution incident to: (i) The owners or occupiers of premises in the vicinity of the premises to which the EPL relates, and (ii) The local authority for the area in which the premises to which the EPL relates are located and any area affected, or potentially affected, by the pollution, and (iii) Any persons or authorities required to be notified by Part 5.7 (of the POEO Act)	Section 4.2 & 5
(b)	A detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant EPL to reduce or control any pollution	Section 4.2
(c)	The procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution	Section 4.2



Section 153C	Content Requirements	Relevant Section of PIRMP
	caused by the incident and, in particular, the persons through whom all communications are to be made	
(d)	Any other matter required by the Protection of the Environment Operations (General) Regulation 2009 (as set out below): 98C (1)(a) A description of the hazards to human health or the environment associated with the activity to which the licence relates (the "relevant activity").	Section 2.1
	98C (1)(b) The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood.	Section 2.1
	98C (1)(c) Details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity.	Section 6
	98C (1)(d) An inventory of potential pollutants on the premises or used in carrying out the relevant activity.	Appendix B
	98C (1)(e) The maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.	Section 2.2 & Appendix B
	98C (1)(f) A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident.	Section 3
	98C (1)(g) The names, positions and 24-hour contact details of those key individuals who: (i) are responsible for activating the plan, and (ii) are authorised to notify relevant authorities under section 148 of the POEO Act, and (iii) are responsible for managing the response to a pollution incident.	Section 4.2
	98C (1)(h) The contact details of each relevant authority referred to in section 148 of the POEO Act.	Section 4.2
	98C (1)(i) Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on.	Section 5
	98C (1)(j) The arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on.	Section 4.2
	98C (1)(k) A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any storm water drains on the premises.	Appendix A, Appendix C & Appendix H
	98C (1)(l) A detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk.	Section 4.2 & 5
	98C (1)(m) The nature and objectives of any staff training program in relation to the plan.	Section 6
	98C (1)(n) The dates on which the plan has been tested and the name of the person who carried out the test.	Section 7



Section 153C	Content Requirements	Relevant Section of PIRMP
	98C (1)(o) The dates on which the plan is updated.	Section 7
	98C (1)(p) The manner in which the plan is to be tested and maintained.	Section 7

2.0 Availability of the PIRMP

The PIRMP shall be kept at North Rocks, with a hard copy available at the Gatehouse of the premises and shall be made available to all personnel responsible for implementing the plan, and to an authorised officer (as defined in the POEO Act) on request. Certain parts of the PIRMP are extracted in this document.

3.0 Contact Relevant Authorities, Site Personnel & Neighbouring Businesses

In the event of a pollution incident, site personnel must notify the following authorities (in order) IMMEDIATELY:

- Emergency services (ONLY if the incident is or has the potential to present an immediate threat to human health or property) – **000**
- NSW Environment Protection Authority - **131 555**
- The Hills Shire Council - **(02) 9843 0555**
- Work Cover - **131 050**

Site personnel will also immediately contact key management members including the Factory Director, the Quality and Environment Manager, Operations Manager and Engineering manager. Contact details are on the PIRMP available at the Gate house of the premises.

4.0 Communication with Neighbours and the Local Community

In the event of a pollution incident occurring at North Rocks affecting neighbouring properties, the site’s neighbouring properties and the local community will be kept informed. This will occur in conjunction with relevant emergency services and the site emergency controller. The most relevant communication strategy will be identified and utilised, which could include:

- Media release;
- Direct contact (e.g. door knocking);
- Letter box drop; or
- Information signage at the site entrance

Information provided to the neighbours and local community will be relevant to the incident and may include the following details:

- Type of incident that has occurred;
- Potential impacts to local landholders and the community;
- Site contact details; and
- Advice or recommendations based on the incident type and scale.

If the emergency is likely to affect neighbouring businesses, they will be contacted at the Gatehouse, to advise them of the known situation. The call should be brief, for example:



This is [state name] from Unilever. We have had a chemical spill on our site and have evacuated all our personnel and emergency services and the EPA have been notified. Please take any necessary precautions to ensure your own safety and please contact emergency services for further information and the 'all clear'.

A list of all neighbouring businesses with contact numbers is available at the Gatehouse of the premises.

All possible actions will be taken to control the pollution incident and minimise health, safety and environmental consequences. These actions must be employed to the maximum extent possible to:

- Provide for the safety of people at and within the vicinity of the site, and
- Contain the pollution incident.