

Pollution Incident Response Management Plan SMITHFIELD

15-21 Britton Street
Smithfield NSW 2164

Introduction

Snackbrands Australia Ltd Pty holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Smithfield Manufacturing 15-21 Britton Street, Smithfield, NSW.

As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test, and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs during an activity where material harm to the environment is caused or threatened, the person carrying out the activity must **immediately implement this plan**.

This must be done in accordance with Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, and/or by providing a copy of the plan to any person who makes a written request. The sections of the plan required to be publicly available are set out in clause 98D of the (General) Regulation 2009.

This plan is developed in accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2009 and EPA's Guideline: Pollution incident response management plans.

DUTY TO NOTIFY OF A POLLUTION INCIDENT:

There is a duty to notify 'relevant authorities' as specified in section 148(8) of the POEO Act

- EPA, local authority,
- Ministry of Health, SafeWork NSW (formerly Workcover) and
- Fire and Rescue NSW)

of any pollution incidents where material harm (see definitions below) is caused or threatened.

DEFINITIONS

Pollution Incident: An incident or set of circumstances during or because of which there is or is likely to be a leak, spill or other escape or deposit of a substance, because 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 a premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

Material Harm: includes actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial or that results in actual or potential **Loss** or property damage of an amount over \$10,000.

Loss: the reasonable cost and expenses that would be incurred in taking all reasonably practicable measures to prevent, mitigate or prevent harm to the environment.

Relationship with other Emergency Plans:

The PIRMP must be review and read in conjunction with:

- WHS_PR_07_004S – Emergency Procedures Manual _ Smithfield 1
- WHS_PR_07_001 – SBA Emergency Management and Preparedness.

1 Initial Response to Pollution Incident

Immediately engage in harm minimisation/spill containment as per procedures in Site Emergency Response Plan (ERP), or Pollution Incident Response Management Plan (PIRMP).

1.1 Actions to be taken in case of a pollution incident

1. If an incident poses immediate threat to human health or property, call 000 Emergency Services, escalate to Head of HSE and follow the next steps.
2. Assess the level of pollution, escalate to immediate Supervisor or Manager who will decide whether the incident is a 'notifiable' incident. If not, move to step 6.
3. If the incident is considered 'notifiable', escalate to the Environmental Manager or Head of HSE.
4. If required, notify neighbours and the local community. See section 3 of the PIRMP.
5. Environmental Manager or Head of HSE to notify the five authorities (EPA, local council, NSW Health, Safe work NSW, Fire and Rescue NSW)
6. Create an Incident Management Team and Emergency Coordinator to delegate tasks.
7. If safe to do so, contain the spill (penstock valve closure, spill kit and PPE use).
8. Proceed to clean-up materials used to contain and clean the spill and dispose of them appropriately.
9. Report incident in MyOSH within 24h.

1.2 Incident Management team creation

The following individuals form the incident management team.

Team Member	Role
Emergency Coordinator	Delegate below actors
Safety Controller	Ensure appropriate PPE, manage any traffic, watch for any further risks, hazards, injury
Information Controller	Relay information, get SDS and communicate information, Gofer where required, Report
Combat Assistant(s):	Deploy stormwater isolation valve, get spill kit, get other combat materials, determine where spill has gone and where the spill is going
Other Support Members	Cleanup and Waste Management: Waste storage and pump out truck contractors.

2 Communication Plan

The following external authorities need to be contacted based on immediate threats and no immediate threat.

2.1.1 Authorities to be contacted in case of notifiable incidents

If incident poses immediate threat to human health or property (MUST notify in following order):

Organisation	Number
EPA (Environment Line)	131-555 9995-6563/9995-5555 info@epa.nsw.gov.au
The Ministry of Health – Local Public health Unit	1300 066 055
Fire and Rescue NSW	1300 729 579
Safework NSW	131-050
Cumberland Council	8757-9000

2.1.2 Persons responsible to notify Authorities

Notification should be made by a person with an appropriate level of authority within the company.

Notification to Authorities	
Contact: Position or title:	Maria Rossi Environment Manager
Contact: Position or title: :	Head of Health and Safety

3 Community Notification

Neighbours must be informed by phone of incidents that may impact them, including early warnings and regular updates.

3.1 Actions to be taken:

Step 1: The Site Manager upon becoming aware of a notifiable pollution incident assesses the severity of the incident and the impact on neighbouring properties by considering the following:

- Does the pollution incident have the potential to affect one or more neighbouring properties?
- How will the incident affect them (including long- and short-term effects)?
- What actions do neighbours take to protect themselves from harm and minimise property risk?

Step 2: Site Manager contacts the Environmental Manager as soon as possible to inform of the incident and possible impacts on neighbouring properties.

Step 3: Site Manager or designated person contacts neighbouring properties deemed necessary to provide the following information relevant to the pollution incident:

Step 4: The Environmental Manager liaises with SBA management on the communication strategy to be employed. The Site Manager will use this direction to inform nearby properties and the wider community of important information related to the environmental incident.

4 Spill Clean-ups

4.1 Information to provide to pump-out services

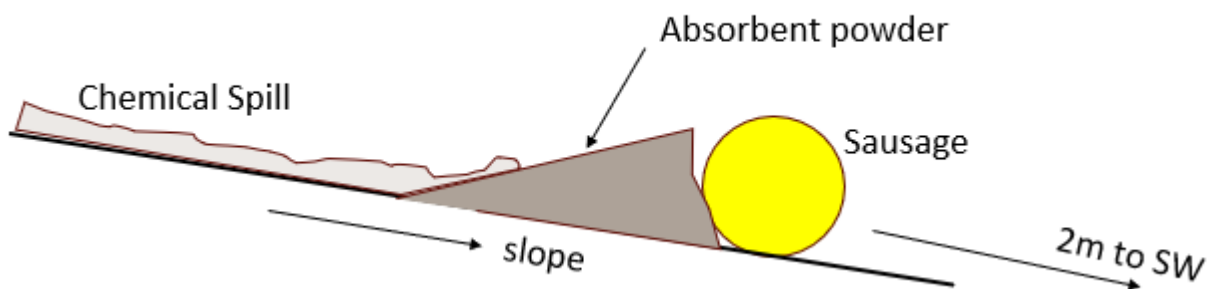
In event of a major spill, provide the following Information to truck/spill services over the phone.

1. Location of spill
2. Access to spill site
3. Type of chemical – get from SDS
4. Name of chemical – get from SDS
5. Quantity (estimate) of spill
6. Type of exposure e.g. inhalation, dermal, ingestion, ocular and/or environmental (enter soil, water, air or impact biota)
7. H&S- Number of casualties (if any), state of consciousness and treatment being provided.

4.2 Spill Incident Procedure

1. Ensure safe access, activate stormwater isolation valve.
2. Need assistance? Report internally & **create incident management team**.
3. Check safety (SDS) to determine the type of spill, assess volume, assess where spill is going.
4. Use appropriate PPE – injury/harm takes priority.
5. If considered safe, deploy spill kit. If not safe, call HS&E Officer.
6. Stop the spill/leak (make temporary bund – use sausages, absorbents, sandbags, drain mats).
7. Contain the spill/leak (divert, if possible, to contain).
8. Build dam downslope (see next slide).
9. Call and notify the “who to call” below – if required, Jackie will notify emergency services.
10. Clean up area.
11. If deemed necessary, Jackie to notify agencies/neighbours per Phase 3&4 of PIRMP Activation.
12. If required, engage waste management company (pump out).
13. Report (date, time, location, people & equipment involved, incident description, type (chemical, hazards, pollutants involved), scale (est. volumes), incident contained or going off site?

4.3 Making Spill Kit Dams



1. Lay sausages in crescent shapes downstream to form a dam wall about 2 meters from the stormwater drain.
2. Place a rubber stormwater matt over drain.
3. Apply absorbent powder on liquid upstream to stop leak.
4. Apply absorbent powder around edges of rubber drain matt.
5. If dam leaks build another dam lower down.

