

# Pollution Incident Response Management Plan SMITHFIELD

15-21 Britton Street  
Smithfield NSW 2164

Environment Protection License (EPL) Details	
Name of licensee	Snackbrands Australia Ltd Pty
EPL	21202
Scheduled activities EPL	General Agricultural Processing
Location	Snackbrands Smithfield Manufacturing Site 15-21 Britton Street Smithfield NSW 2164 Lot 1 DP 597082
Geo-position	<b>Latitude:</b> -33.842048 <b>Longitude:</b> 150.939573
Principle Contact	Head of Health, Safety and Environment 0410 515 252
Company website	<a href="https://www.snackbrands.com.au">https://www.snackbrands.com.au</a>

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# 1. 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.

## 2. 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. If incident immediate threat to human health or property, immediately contact 000 Emergency Services
2. Assess the level of actual or potential pollution and decide whether the incident is a 'notifiable' incident.
3. If the incident is considered 'notifiable' the following agencies must be notified immediately.
4. Notifying neighbours and the local community

If the incident impacts the community undertake telephone contact as outlined below

### Minimising harm to people on Premises

1. Activation of evacuation procedures, including the activation of audible alarms to notify the evacuation of personnel to assembly areas. These clearly communicated to site personnel via signage which is reinforced during induction and simulated evacuation training.
2. The availability and use of PPE as mentioned in the above table.
3. Availability and use of Spill kits as advertise in Spill Incident Procedure 9 (Appendix)
4. Requirement for contractors to complete OH&SE sign-on and inductions.
5. All Persons to complete formal Covid declarations & acknowledge site requirements to mitigate.
6. Contractors/Site personnel complete risk assessments / JSA (job safety analysis) & hot work permits before undertaking works.

### Actions to be taken

1. If the situation poses immediate threat, call emergency services, and activate evacuation plans.
2. If the situation does not pose an immediate threat shutdown, any relevant equipment and if safe to do start attending clean up and remediation measures.
3. Create an incident Management Team and Emergency Manager to delegate tasks.
4. Site Operations manager or Environment Coordinator should coordinate response.

### 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.

## 3. Communication Plan

### External Notifications

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

#### Immediate Threat

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

Organisation	Contact	Number
Emergency Services NSW Police/Fire/Ambulance	Emergency Services	000
Fire & Rescue NSW / Rural Fire Service	Switchboard	000
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Fire & Rescue NSW- to inform but does not require fire unit on site	Direct	1300 729 579
EPA (Environment Line for pollution and environment incident reports)	Switchboard	131555
SafeWork NSW	Switchboard	131-050

#### No Immediate Threat

If no immediate threat to human health or environment, MUST undertake notification of the following:

Organisation	Number
EPA (Environment Line)	131-555
Fairfield City Council	(02) 9725 0222
Sydney Water – unusual large discharge volumes/substance	132-090
The Ministry of Health – Local Public health Unit	1300 066 055
Safework NSW	131-050
Fire and Rescue NSW	1300 729 579

#### SBA Responsible Persons

The following individuals are responsible for managing any incident response.

Managing Response to Pollution Incident
Environmental Manager 0410 515 252
WHS Advisor
Manufacturing Manager
Sanitation Lead
Maintenance Team Leader

#### Persons responsible to notify Authorities

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

Notification to Authorities
Environmental Manager
Head of Health and Safety
Manufacturing Manager 1
Manufacturing Manager 2

**Responsible Regulatory Authorities**

Relevant Authority contact numbers	
Emergency Services	000
Fire and Rescue NSW	9622-8932
EPA – General Contact	9995-6563 131-555 9995-5555 <a href="mailto:info@epa.nsw.gov.au">info@epa.nsw.gov.au</a>
NSW Health- Parramatta Public Health Unit (Western Sydney LHD) Phone:	(02) 9840 3603
<a href="http://www.health.nsw.gov.au/Infectious/Pages/phus.aspx">www.health.nsw.gov.au/Infectious/Pages/phus.aspx</a> for local contact details	(02) 98818215 (02) 9881 8000 (ask for Public Health Officer on call)
SafeWork NSW	131-050
Local Authority: Cumberland Council	8757-9000

## 4. Community Notification

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

**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.

### Key High-Risk Community Stakeholders

High risk nearby properties are populated in the complete PIRMP document

Stakeholders	Distance (km)	Name	Address	Telephone	Map ID

### Water Pollution Incident - Neighbours to Notify

All Neighbours in the table below are located downstream from the point where stormwater pipes that carry water from SBA Smithfield site enter Prospect Creek.

Downstream	Neighbour	Address	Contact	Map ID
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### Air Pollution Incident - Neighbours to Notify

Neighbouring properties that may be affected by reduced air quality. Check wind speed and direction and notify relevant neighbouring sites.

Direction from SBA	Distance (m)	Neighbour	Address	Contact	Map ID

## 5. Spill Clean-up Contacts

### 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.

### Pump-out Service Contacts

\*Needs to be updated and reviewed yearly

Pumpout truck service	Contacts*
Large volume spill – Veolia	0438 651 306 or 132 955
Approved Hazardous Contained Waste Removal – Chem waste	1300 688 011

### Spill Incident Procedure

#### Steps after alarm raised

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?)