



ABN: 66 008 709 608

**Pollution Incident Response Management Plan
(PIRMP)**

Teralba Asphalt Plant

Rhondda Road Teralba NSW 2284

Document Preparation and Control	Document Review
Colin Biggs - Environmental and Sustainability Advisor	Steven Bayliss – Operation Manager - Teralba
Document Approval	Signature
Rick Hollindale – Production and Recycling Manager	

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0	14/11/2022	Draft	Draft for review
1.0	16/11/2022	Final	Initial site-specific details added
1.1	18/01/2023	Final	Emergency Fire wardens nominated within the scope
2.0	23/02/2023	Final	Addition of dangerous goods plan, site emergency equipment diagram, Annex hazardous material screening limits and environmental risks. Upload to Fixed Plant SharePoint.
2.1	08/05/2024	Review	Update Post Drill and Flood Management



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1 PURPOSE AND SCOPE

The purpose of this plan is to ensure that systems are in place at the site to minimise the potential impacts associated with pollution incidents events. In order the streamline the processes onsite, the term “*pollution incident*” is considered an emergency event.

If an emergency event occurs the priorities must be:

1. The safety of all persons on site (including visitors and contractors).
2. The safety of nearby residents.
3. Minimum impact on the environment.
4. Normal business operations are returned to normal as soon as possible.

The scope of activities conducted at this site includes, but not necessarily be limited to work relating to the following activities:

1. Asphalt Production
2. Recycled Asphalt Repurposing (RAP)
3. Quality Testing (Laboratory)

As an Environmental Protection Licence has been granted to the site, a Pollution Incident Response Management Plan (PIRMP) has been developed to meet the conditions to comply with Part 5.7A of the *Protection of the Environment Operations (POEO) Act 1997*.

In order to meet this requirement, the following document had been developed for implementation at the Licenced site for the activities carried out on the site.

2 SITE EMERGENCY PROFILE

2.1 Site Details

Site Name:	Teralba Asphalt Plant		
Address:	158 Rhondda Road Teralba NSW 2284		
Phone:	Business hours: (02) 4958 0300 After hours: 0407 670 384 (Steven Bayliss)		
Buildings and Structures:	<p>The buildings and structures on site that are occupied are as follows:</p> <ul style="list-style-type: none"> ▪ Asphalt Production ▪ Laboratory ▪ Workshop ▪ Single Storey, Brick Site Office ▪ Storage Shed 		
Hours of Occupancy:	Usual office operating hours are generally between 6am – 5pm, Monday to Friday (but subject to change with extended hours and weekends due to production requirements)		
Shift Details	Shift Name	Hours	No. of People
	Dayshift Production	6:00am – 3:00pm	7
	Office Hours	8:00am – 4:00pm	5



	Nightshift Production	6:00pm – 3:00am	5
Security Service Provider:	Organisation and 24-hour phone numbers Telstra SNP Monitoring 1300 303 017		
Fire and Emergency Equipment Contact:	Organisation and 24-hour phone numbers Newcastle Fire Extinguisher Service (02) 4957 4054		

2.2 Site Location

Lot 1, 158 Rhondda Road Teralba NSW 2284



2.3 Site Layout

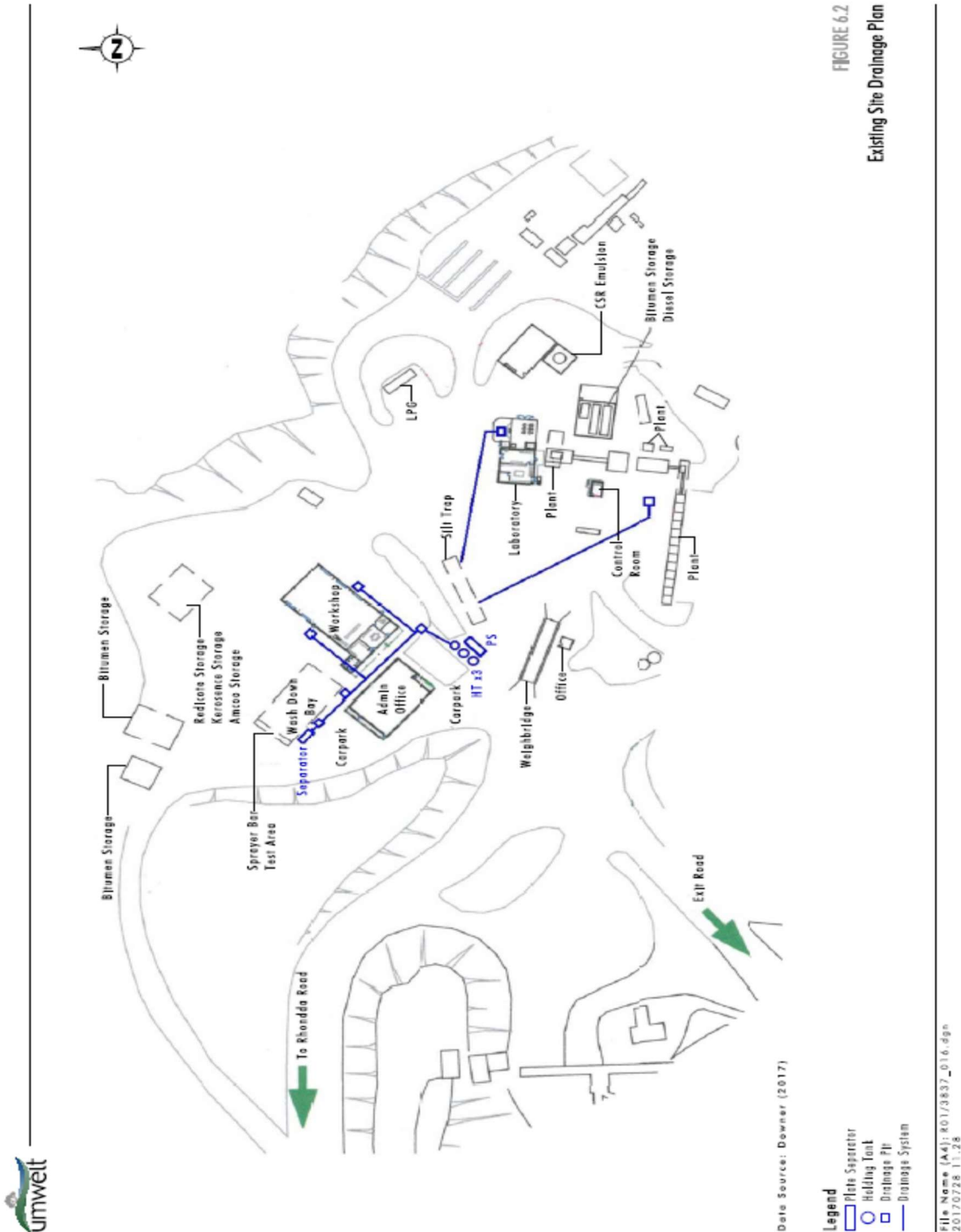
The site is located at Lot 1 DP224037 within the Metromix Quarry on Rhondda Rd within Teralba NSW in the Lake Macquarie local government area (LGA). The asphalt plant has operated on the site for over 30 years with a new plant constructed in early 2019 and produces asphalt for regional road construction projects.





2.4 Site Stormwater System Map

The site is in a sub-catchment of the quarry and runoff drains to a silt trap which discharges into the quarry water management system for reuse for mine site water management purposes. Discharge of any water is processed and meets the requirements of the Metromix EPL.





2.5 Details of Neighbouring Facilities

Neighbouring Facilities	Contact Person & Phone number	Mechanism for Raising the Alarm and Ongoing Communication	Circumstance for Raising the Alarm
Metromix Quarry	Renee 4950 6640	By Phone	Fire / Explosion / Pollution Incident

3 COMMUNICATION OF THIS PLAN

This PIRMP shall be communicated to personnel through site inductions, and will be displayed on site and contained within the Downer Site Zero Harm Management Plan (ZHMP) documentation. Site specific evacuation procedures (incl. muster points and the identities of ERT personnel) will be displayed on noticeboards and in prominent positions throughout the site/buildings.

As required by the POEO Act, and to allow appropriate communication of the plan, a current copy of this plan is to be located on premises at all times and able to be provided to an authorised EPA officer on request.

In addition to having an onsite copy, the PIRMP will also have a copy made publicly available on the [Downer Group Website](#).

This PIRMP shall be communicated to personnel through site induction, at Toolbox and Pre-Start meetings and will be displayed on site and contained within the Project Zero Harm Management Plan (ZHMP). Site specific evacuation procedures (incl. muster points and the identities of ERT personnel) will be displayed on noticeboards and in prominent positions throughout the site/buildings. Emergency Organisation & Responsibilities

3.1 Production Manager

General Requirements

Be fully conversant with the requirements of this Plan.

Ensure the PIRMP is fully implemented, monitored and adjusted to suit the requirements of the operations system and the client's requirements.

Ensure the requirements of the Management System are fully complied with when administering the PIRMP.

Ensure all employees are conversant with their responsibilities and duties under the PIRMP.

Communication

Ensure any bulletin or information pertaining to emergency plans and management is placed on the Zero Harm Notice Board and other noticeboards.

Maintain lists of employees' and contractors' emergency contacts/next of kin either on site or via the HR system. Ensure that relevant emergency contacts are notified in case of an pollution incident.

Notify senior management of any pollution incident in accordance with [DA-ZH-PR006 Incident Reporting and Investigation](#). Only authorised spokespeople may liaise with the Media (refer [DA-ZH-PR013 Communication and Consultation](#) and the Downer Group Media Policy).

Training

Educate supervisory personnel in accordance with plan requirements, statutory obligations, and relevant procedures contained in the Integrated Management System (IMS).

Have been inducted into Downer Australia safety and environmental management systems and procedures.



3.2 Production Supervisor

Being familiar with the requirements of this PIRMP.

Ensuring incidents are managed and strictly supervised in accordance with the PIRMP, company policies and procedures.

Being familiar with legislation and codes of practice relevant to this role and ensuring the requirements of the same are brought to the attention of interested parties and implemented as is practicable across the project site.

Communication

Ensuring the requirements of the PIRMP are communicated to all personnel, subcontractors and where appropriate, visitors to site through on-site daily Pre Start meetings, Site Inductions, weekly Toolbox Meetings and Safe Work Method Statement (SWMS) review on commencement of new works with the potential to impact personnel and the environment.

Any external contact will be communicated to the client via the Project Manager or their delegate.

3.3 Employees, Contractors and Visitors

On identification of a situation requiring emergency response each employee has the responsibility to immediately notify the site supervisor or delegate. In the event of a serious situation, or a situation requiring immediate medical response, the employee shall utilise this "Plan" to make direct contact with the closest medical facility.

When directed by the Chief Warden or his/her delegate, it is the responsibility of each person to evacuate the workplace via the nearest safe exit/route, after turning off any machinery in use and proceed to the designated external muster point and stay there until given further instruction.

3.4 Pollution Incident Response Team

The emergency team is tasked with co-ordination and control of the response to a pollution incident. Where an evacuation is required, the team will be responsible for accounting for all personnel and for any actions deemed necessary to limit the impact of the emergency on the site and its personnel.

Members of the emergency team assume authority over all personnel within the scope of their responsibilities. They are accountable to other members of the team within the hierarchy and to members of the Emergency Services (Ambulance, Fire, Police, etc.).

Emergency Response Team Hierarchy

Chief Warden:	Production Manager
Area Warden:	Weighbridge Operator
ERT Advisor / Support:	Zero Harm Representative (ZHR) or other nominated workers with a minimum current Senior First Aid (Level 2) qualification

In the absence of a member of the Emergency team, the Site Manager will appoint the next most senior member of the team to assume the role of the absent member. In the absence of the Site Manager, the Warden whose area of responsibility encompasses the emergency location shall assume the role of Emergency Controller.

Emergency Team members shall report planned absences (i.e. annual leave, sick leave) to that position. In cases where only one or two wardens are on site, such as back shifts or weekends, the warden/s will be required, in addition to their role, to ensure that appropriate emergency services are contacted.

For additional information please refer to **Section 8** of this document.



4 LEGISLATIVE REQUIREMENTS

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the *POEO Act* and Clauses 131 of the *Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation)*.

In summary, this provision requires the following:

- All holders of environment protection licences must prepare a pollution incident response management plan.
- The plan must include the information detailed in the POEO Act and be in the form required by the POEO(G) Regulation.
- Licensees must keep the plan at the premises to which the environment protection licence relates.
- Licensees must test the plan in accordance with the POEO(G) Regulation.
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan.

5 DEFINITION OF POLLUTION INCIDENT AND NOTIFICATION REQUIREMENTS

The definition of 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.

5.1 Notification Requirements

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which 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.

Notification responsibilities for incidents that have caused or threaten to cause material harm to the environment are detailed in Section 148 of the POEO Act. In summary, these are broadly categorised as:

5.1.1 Duty of an employee or any person undertaking an activity:

Any person engaged as an employee or undertaking an activity with regard to the site will, immediately after becoming aware of any potential incident (even if outside of normal business hours), notify the Production Manager of the incident and all relevant information about it. The Production Manager will be available 24 hours a day, seven days a week and have the authority to stop or direct works.

5.1.2 Duty of an employer or occupier of the premises to notify:

The employer or occupier of the premises (in this case, the Production Manager) on which the incident occurred, who is notified (or otherwise becomes aware of) of the incident, will immediately notify the relevant authorities about the incident and all relevant information.



Under the POEO Act, 'relevant authority' means any of the following:

- The appropriate regulatory authority – the Environment Protection Authority (EPA).
- If the EPA is not the appropriate regulatory authority – the local authority for the area in which the pollution incident occurs (i.e. council).
- NSW Public Health Unit.
- SafeWork NSW.
- Fire and Rescue NSW.

Section 15 of the PIRMP lists the contact details for these authorities.

5.1.2.1 Relevant Information for Incident Reporting

Section 150 POEO Act – Outlines the relevant information to be given when notifying a Pollution Incident.

1. The relevant information about a pollution incident required under section 148 consists of the following:
 - a) the time, date, nature, duration and location of the incident;
 - b) the location of the place where pollution is occurring or is likely to occur, the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
 - c) the circumstances in which the incident occurred (including the cause of the incident, if known);
 - d) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known;
 - e) other information prescribed by the regulations.
2. The information required by this section is the information known to the person notifying the incident when the notification is required to be given.

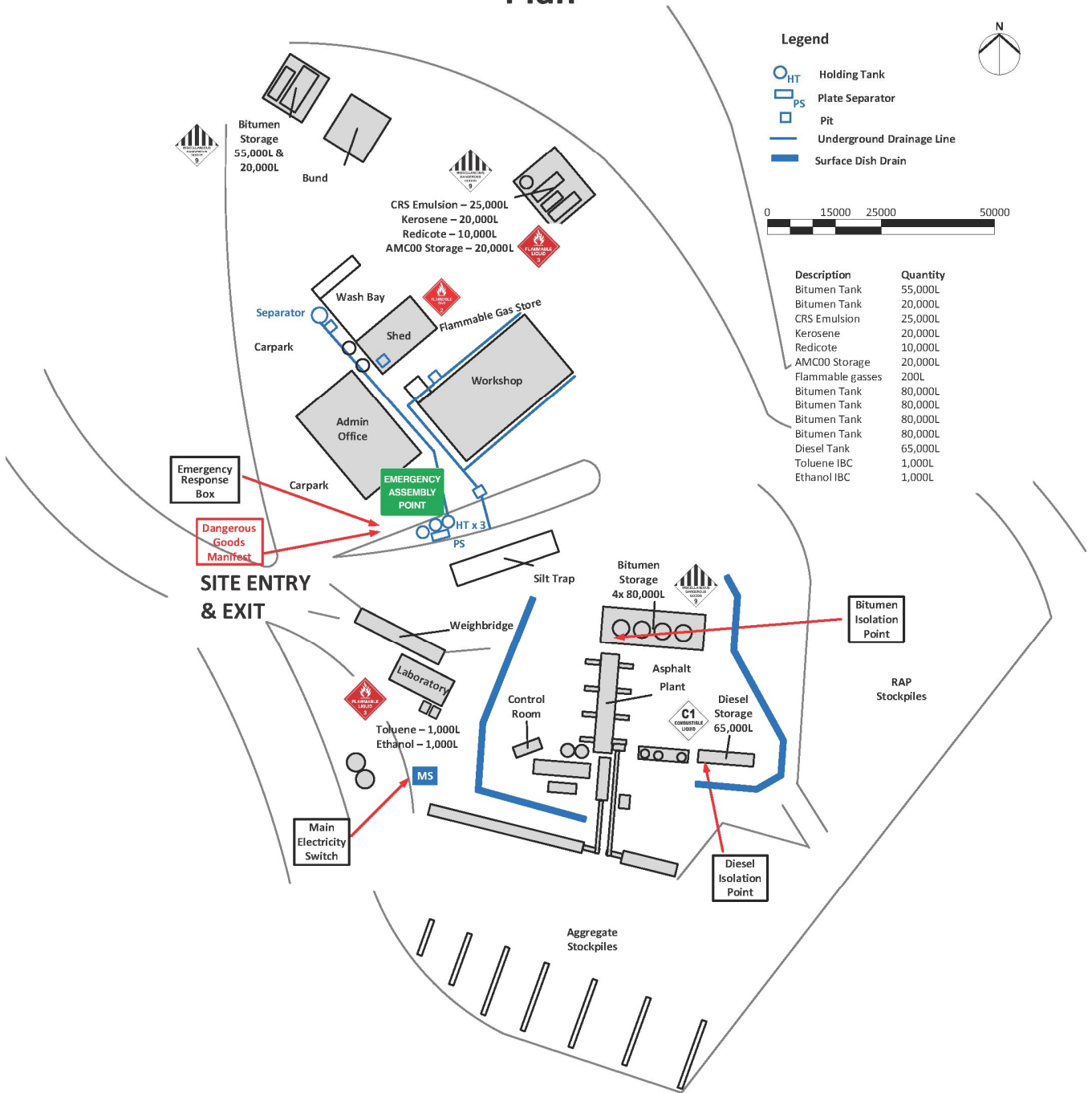
If the information required to be included in a notice of a pollution incident by subsection (1) (c), (d) or (e) is not known to that person when the initial notification is made but becomes known afterwards, that information must be notified in accordance with section 148 immediately after it becomes known.



6 INVENTORY OF POLLUTANTS

Dangerous Goods Plan

Teralba Asphalt Plant
150 Rhondda Rd
TERALBA NSW 2284



Plan Updated 22 / 02 / 2023



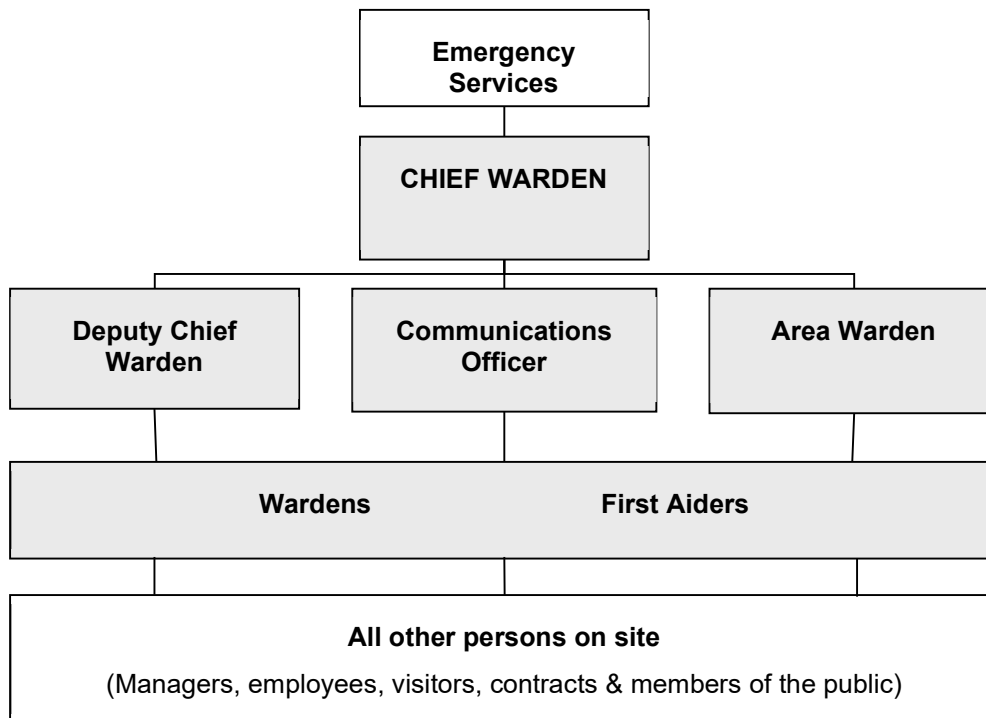
7 EMERGENCY RESPONSE TEAM (ERT)

The Emergency Response Team (ERT) is responsible for taking control of the site after the occurrence of a pollution event until such time either:

- external emergency services (e.g. police, fire services or Workplace health and safety authority) take control of the site; or
- the event subsides.

Roles and Reporting Structure

The following figure illustrates the roles of the ERT and the reporting structure that exists in the event of an emergency.



Selection Criteria for Team Members

Persons appointed to roles on the ERT will be:

- physically capable of performing their duties
- have leadership qualities and command authority
- have maturity of judgement, good decision-making skills and capable of remaining calm under pressure
- be available to undertake their duties; and
- be willing to undertake routine training

Authority

During emergencies, instructions given by the ERT personnel takes precedence over the normal management authority structure.

The ERT will act to make sure that the health and safety of people takes precedence over the protection of assets, environmental considerations, production operations and business continuity.



ERT Members

The following personnel make up the emergency response team.

Shift A			
Area	Role	Name	Contact
X	Chief Warden	Rick Hollindale	0400 454 646
X	Deputy Chief Warden	Mick Gurney	02 4958 0311
X	Communications Officer	Steven Bayliss	0407 670 384
Lab/Production	Warden	Jodi Hutchens	0448 291 097
Office	Warden	Steven Bayliss	0407 670 384
Lab/Production	First Aider	Jarrod Mitchell	0412 472 641
Office	First Aider	Sam Fairall	0409 455 524

8 ROLES AND RESPONSIBILITIES

Role	General Responsibilities
Chief Warden/ Deputy Chief Warden	<ul style="list-style-type: none"> Lead and coordinate response to an emergency or pollution incident. Effectively communicate with personnel and external parties. Be familiar with the site/ operation/ project.
Communications Officer	<ul style="list-style-type: none"> Effectively communicate with personnel and external parties as directed.
Area Warden	<ul style="list-style-type: none"> Assist the Chief Warden and direct emergency procedures within a defined area of the operation.
Operations Manager	<ul style="list-style-type: none"> Provide site/ operation/ project information to the ERT.
Site / Operations Manager and/or Environmental & Sustainability Advisor / Zero Harm Advisor and/or Environmental & Sustainability Manager / Zero Harm Manager	<ul style="list-style-type: none"> Provide site/ operation/ project information to the ERT. Authorisation, administration, maintenance and implementation of the PIRMP Assessing whether the incident has caused or threatens “material environmental harm” and communicate details to management. Make a determination as to whether the incident (as defined in section 147 of the POEO Act) is reportable to external agencies Responsible for taking control of the site after the occurrence of a Pollution event and activating the implementation of this PIRMP until such time either:



Role	General Responsibilities
	<ul style="list-style-type: none"> ○ external emergency services (e.g. police, fire services or Workplace health and safety authority) take control of the site; or ○ the event subsides <ul style="list-style-type: none"> ▪ Coordinate communication to neighbours ▪ Ensuring that investigations are undertaken to a level corresponding to the level of risk and impact. ▪ Inform the Senior Leadership Management Team / Group Management and Notification to External Agencies ▪ Undertake notifications as defined in PIRMP
Supervisor	<ul style="list-style-type: none"> ▪ Notify of an emergency or pollution incident and/ or initiate emergency response. ▪ Assist with coordinating response to an emergency as directed. ▪ Following the procedures outlined in the PIRMP and DG-ZH-PR006 Incident Management Procedure. ▪ Immediately alerting Site Manager or, in case of their unavailability, Environmental Representative or Environment Manager of any potentially material environmental incidents or near-misses. ▪ Assist in conducting incident investigations.
Workers	<ul style="list-style-type: none"> ▪ Notify of an emergency. ▪ Follow instructions provided by the ERT. ▪ Following the procedures outlined in this plan and related documents ▪ Immediately alerting Site Manager or Team Leader of any environmental incidents or near-misses.

9 EMERGENCY TRAINING AND AWARENESS

All Personnel shall be provided with general Emergency Management Training as part of the site induction training process, and such training shall cover as a minimum:

- the locations of all emergency equipment and the correct method for its use.
- Risk awareness training to encourage awareness of the dangers presented by the site and the means for preventing it.

Personnel who have assigned responsibilities in an emergency situation (i.e. ERT, Fire Wardens, Evacuation Wardens, Site Management and ZH Team) shall be inducted into the PIRMP and provided with appropriate training.

Refer to the Facilities specific Training Needs Analysis/ Skills matrix for training schedule and completed training. This is to include emergency pollution response.



Requirements	Who Should Attend	Frequency	Training Provider
Site emergency systems: <ul style="list-style-type: none"> ▪ Alarms ▪ Communications ▪ Fire detection ▪ Fire suppression 	<ul style="list-style-type: none"> ▪ Spotless 	As per systems frequency	Newcastle Fire Extinguisher Service
Site/ area evacuation drills	<ul style="list-style-type: none"> ▪ All persons on site 	Annually	Downer, Futura Fire
Emergency Response Training	<ul style="list-style-type: none"> ▪ All Production Personnel 	Bi-Annually	Futura Fire
Fire Warden	<ul style="list-style-type: none"> ▪ All Production Personnel 	Yearly	Futura Fire

Incident and Emergency Preparedness includes all activities that focus on essential emergency response capabilities through the development of plans, procedures, the organisation and management of resources, and associated training and education.

10 FIRE SAFETY AND EMERGENCY EQUIPMENT

Below is a listing of the site emergency safety features, emergency response equipment and details of their operation.

Fire Suppression Systems

In the event of a fire, the alarm will sound. Smoke detectors are installed in all rooms/offices within the admin building as well as in the crib room alerting people to exit the building. Break glass fire panels are also present to be activated in the event of a fire.

Water for the site is fed from 2x 20,000l tanks (kept full via float connected to low pressure town mains). The nearest fire hydrants are located adjacent to 22 Rhondda Rd and then in various locations back towards Railway St.

Kitchen areas are supplied with fire blankets.

The main fire control panel is located in the reception area of the main office building.

Emergency Lighting

Emergency lighting is fitted to the main admin building and combined workshop/crib room building. The emergency lighting in these buildings consist of illuminated emergency exit lights on all emergency exits and passageway lights. The emergency exit and passageway lights are fitted with battery back up so in the event of a power outage, they can be expected to still work for at least 2 hours.

Emergency Exits

Designated emergency exits all lead to safe spaces to then follow the egress paths to the Emergency Assembly Point.

Smoke/ Fire Control Systems

Given the size of the buildings on site, there are no internal fire doors required to prevent the spread of smoke or fire.

Spill Containment Systems

Spill kits are located throughout the site and adjacent to areas of spill potential e.g diesel tank, laboratory, workshop. Spill kits are serviced regularly to ensure they remain well stocked and adequate in the event of a spill.



Components within the plant are all located within bunded areas (e.g bitumen tanks) or are self bunded (e.g diesel tank). The loading areas for the bulk delivery of bitumen and diesel are also on small bunded concrete areas to allow the quick clean-up of any potential leaks or small spills that may occur in the unloading process.

The bitumen tank is fitted only with a blind sump which requires a submersible pump to be manually operated following the inspection of the bund water to release any rainwater captured eliminating any potential for contaminated water or products from inadvertently spilling as a result of a drain valve being left open.

Portable Fire Extinguishers

Various types of portable fire extinguishers are present on site to appropriately combat the types of fires that could potentially be encountered:

- A:B(E) Powdered Fire Extinguishers (white) for flammable materials, flammable liquids and electrical fires and particularly used in an outdoor setting. Located across the whole site at appropriate locations given the range of types of fires combatted.
- CO₂ Fire Extinguishers (black) for electrical equipment fires. Located in the office building and adjacent to electrical cabinetry around the asphalt plant
- Foam Fire Extinguishers (blue) for flammable liquids and oils. Located specifically around bitumen and diesel areas

Hydrants and Hose Reels

Fire hose reels are located on the admin building and at the workshop.

11 EMERGENCY WARNING AND INTERCOMMUNICATION SYSTEM (EWIS)

The site EWIS details are as follows:

- alarm tone description – fire bell.
- activation mechanism and location; and Detectors, system in admin office and in lunchroom/toilets section of workshop
- power supply (particularly back-up in the event of power failure). – battery backed up

12 EVACUATION PROCEDURE

Emergency Evacuation Guide (Standard)

All attempts to respond to an emergency situation should at all times ensure personal safety and only be attempted if within the capabilities of the individual.

If an Emergency situation arises...

- Alarm is raised by either the First responder or Emergency Response Personnel (eg activate emergency alarm, radio or contact the emergency channel/line).
- Personnel are to prepare for Evacuation (shutdown plant and equipment if safe to do so) and await further instruction.
- Chief Warden determines appropriate action in line with nature of emergency & initiates evacuation procedure.
- Deputy Chief Warden or Area Warden responds to emergency.
- Area Warden commences immediate evacuation and directs personnel to nearest exit point.
- Warden to take Visitors book & Site Register of workers and contractors on site to Emergency Assembly / Muster Point
- Area Warden checks all areas clear of personnel.



- Area Warden directs and follows all personnel to Emergency Assembly / Muster point.
- Area Warden advises Chief Warden all areas are clear.
- Chief Warden and Area Warden hold personnel in muster area until directed by the Site Supervisor or Emergency Services Personnel.

Note: Emergency Evacuation Drills shall be evaluated and recorded using [DA-ZH-FM015.5 Emergency Drill Observer's Checklist](#)

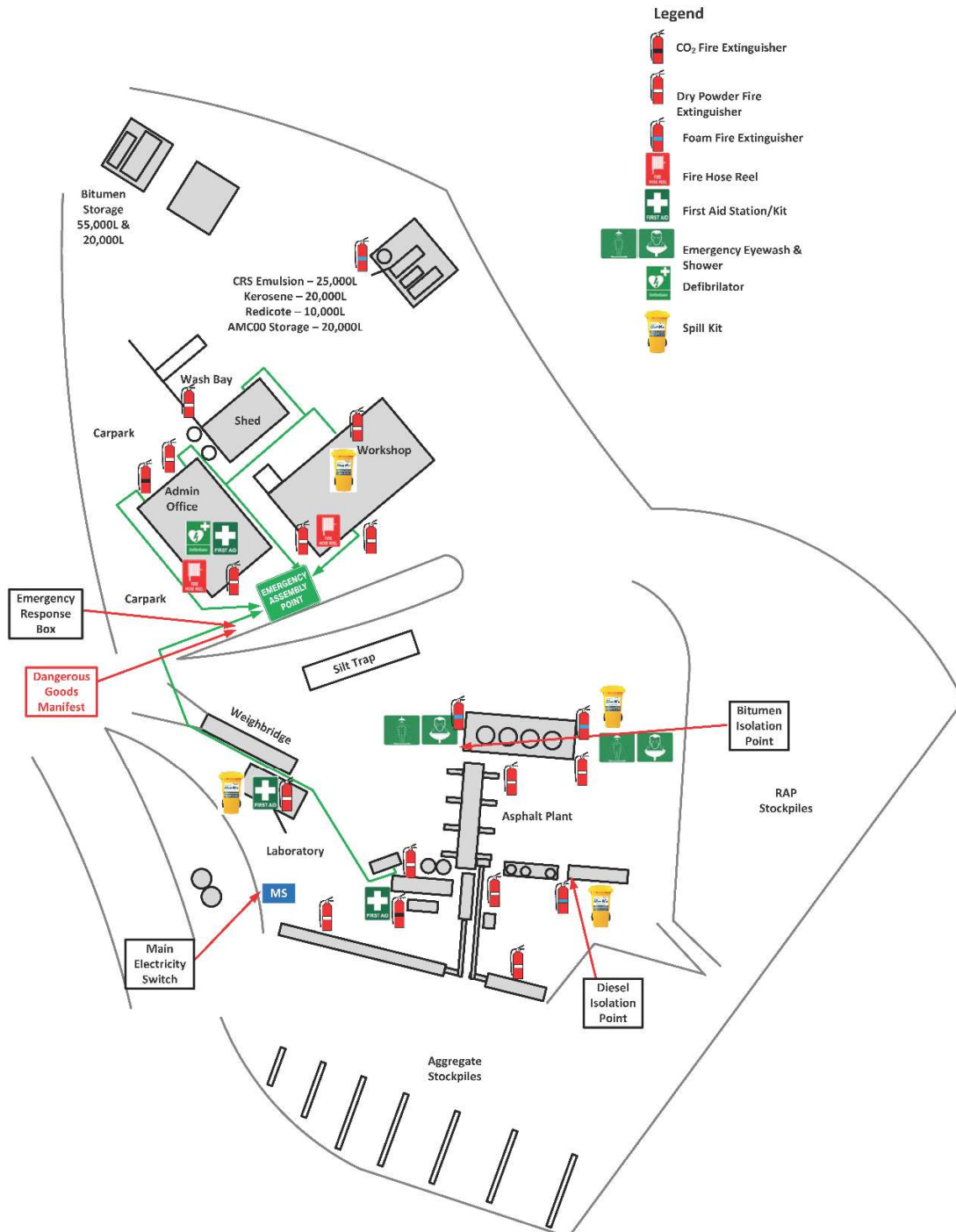


Emergency Assembly Points

All emergency assembly points will be provided once office and site compound locations have been identified in Section 2.3.

Emergency Evacuation Paths

Teralba Asphalt Plant
150 Rhondda Rd
TERALBA NSW 2284





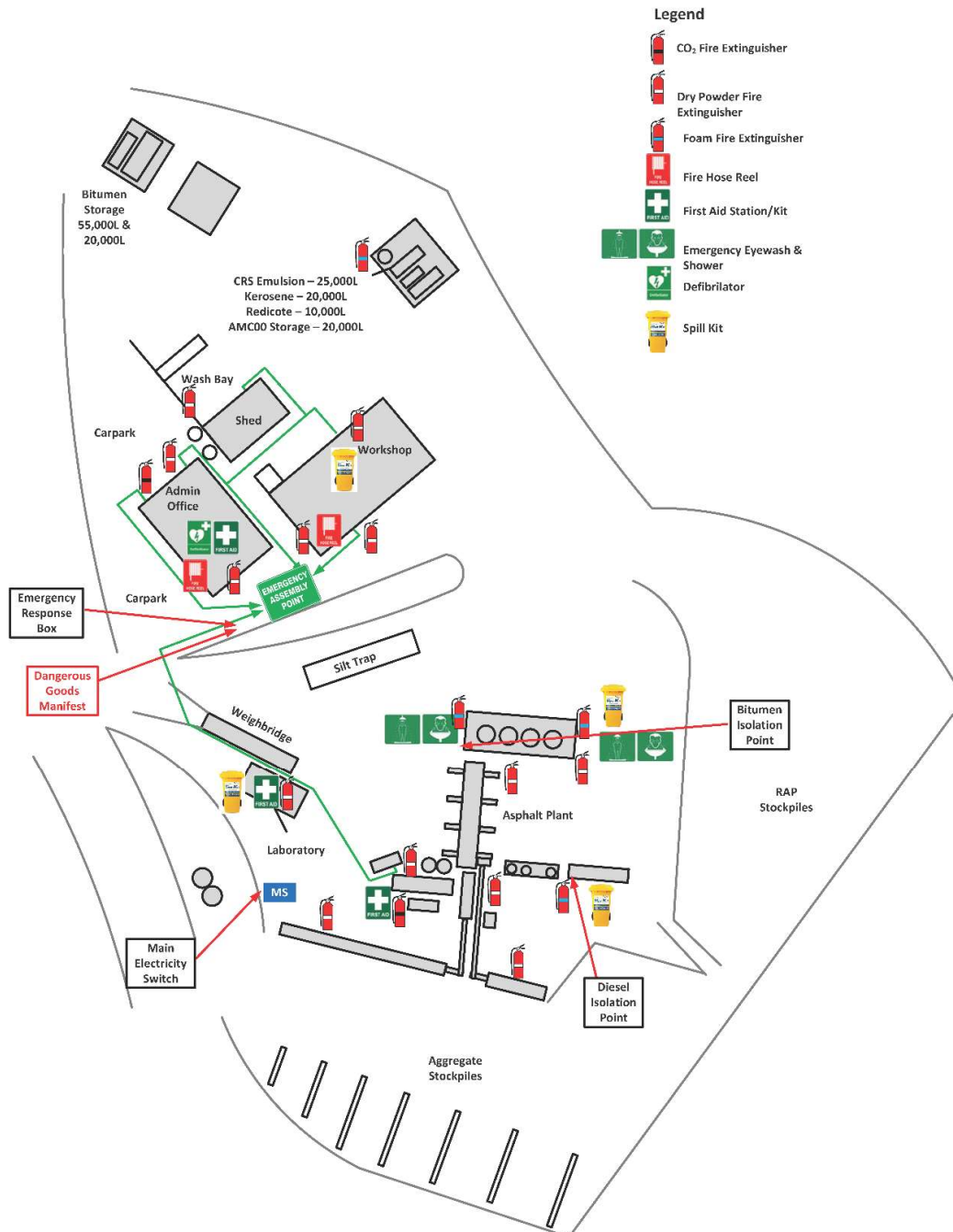
13 LOCK-DOWN PROCEDURES

In the event of a lockdown being required, all personnel are to remain at the emergency assembly point (or other designated areas if the emergency assembly point is not suitable) and await further instruction.

Evacuation Diagram

Emergency Evacuation Paths

Teralba Asphalt Plant
150 Rhondda Rd
TERALBA NSW 2284





14 LIKELIHOOD AND RISKS OF A POLLUTION INCIDENT

In accordance with the Site Risk Assessment outcomes, it has been identified that the key applicable risks to human health, property and the environment identified for the site are as follows. These have been risk rated in accordance with [DG-ZH-PR006 Incident Management Procedure](#):

Risk	Likelihood x Consequence Risk Rating
Dangerous and/or Hazardous materials spillage and discharge to environment (including contaminant discharge and tank failure)	C
Discharge of airborne emissions/contaminants off site	C
Extreme Rainfall Events	C

The likelihood of occurrence is to be reviewed regularly, following events, and in light of adverse weather conditions.

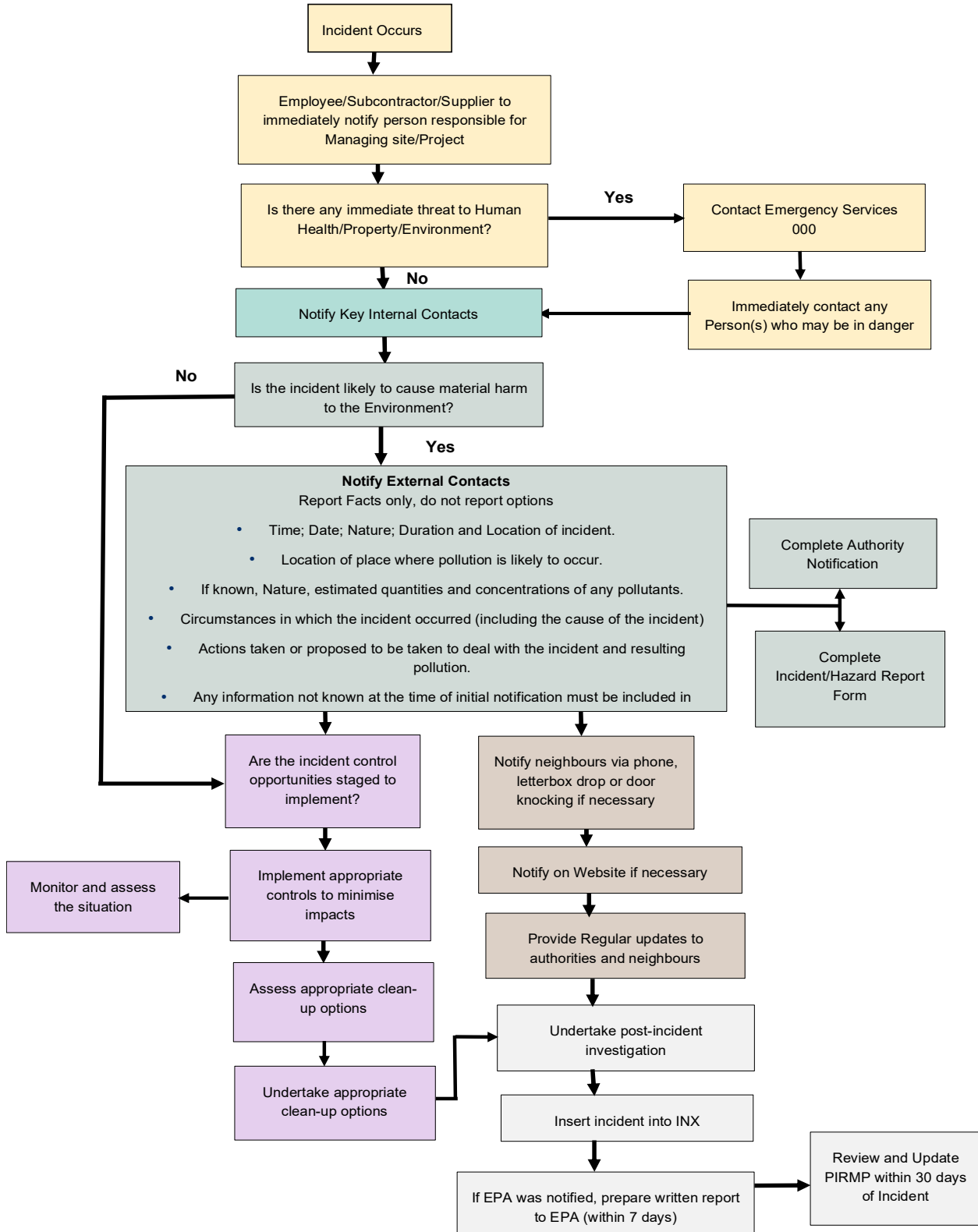
14.1 Pre-emptive Actions

Table 7.2 in the [Operational Environmental Management Plan \(OEMP\)](#) provides measures to avoid, mitigate and manage the potential environmental impacts identified through the environmental impact assessment of the site. These measures are considered pre-emptive actions and the minimal accepted standard of care and aim to ensure any identified risk of harm is reduced.



14.2 Incident Response Plans

If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, the management of these events is to be in accordance with [DG-ZH-PR006 Incident Management Procedure](#). The following flow chart should be used to identify the appropriate course of action.





15 RESPONSE PROCEDURES

Site specific emergency and pollution incident response procedures are contained and located in the emergency information box on front lawn.

15.1 Response Protocols

The notification of an incident is the responsibility of all site and contractor personnel. In the event of an incident, the response protocol must be implemented.

Actual or potential emergency situations will vary in type and severity. The required level of response and notification will be at the discretion of the Site Manager or Project Manager.

- An Incident is an event which causes minor harm to a worker or environment or short-term disruption that can be dealt with by available resources (On site personnel or emergency services).
- An emergency requires immediate action to be taken to preserve life, property or the environment, may include situations that require an evacuation. Examples include situations where there are multiple injuries, threats to a person(s) life, significant damage to the environment, potential for significant impacts to the public.
- Crisis, an event which could cause major disruption to a business with significant impacts. It may be considered a crisis when there is a fatality or immediate danger of loss of life, major workplace health issues, and serious public safety issues likely to attract significant media attention, long term media scrutiny, and catastrophic failure of constructed assets causing injury or disruption to services.

16 EVENT HAZARD RESPONSE PROTOCOL

The following table provides a list of potential foreseeable emergency events and the response/ rescue method and equipment required for each. Refer to the operation's risk register for the risk rating/ level for each event.

Evacuation is always to be considered if fire or explosion potential exists.

Emergency Event	Response/ Rescue Method
Discharge of substance to drains	<ol style="list-style-type: none"> 1. Identify the substance if possible 2. Wear appropriate PPE 3. Follow emergency procedure as per SDS sheets which are in the batch office 4. Contain the substance 5. Where discharge has occurred, and liquids have been retained within the bio basin must be drained 6. Bund the area with equipment from the spill kit (check site map for location) 7. Block off or barricade area 8. Ensure appropriate fire extinguishers are nearby in case fire breaks out 9. Advise site manager 10. Alert neighbours, EPA and Downer ZH manager as required, and if material harm has occurred. Contact Environmental & Sustainability Advisor and notify that a Pollution Incident has occurred.
Fire (inside facilities)	<ol style="list-style-type: none"> 1. Assist any person in immediate danger or who is injured (Call ambulance if anybody is injured) 2. If the fire is small attempt to put fire out with fire extinguisher (familiarize yourself with the location of fire extinguishers) 3. If the fire is too large activate the fire alarm system by pushing the button on 2 of the signed manual call points throughout the plant. One at the control room and the other inside the main office entry,



Emergency Event	Response/ Rescue Method
	<ol style="list-style-type: none"> 4. If the fire is in a building close all doors as everybody is evacuated to stop the fire from spreading 5. Call the fire brigade. 6. Alert neighbours and Downer ZH manager as required
Loss of Product / Tank Failure	<ol style="list-style-type: none"> 1. Shutdown of processes and equipment associated with the spill if safe to do so 2. Wear appropriate PPE 3. Follow emergency procedure as per SDS sheets which are in the batch office 4. Activation of any associated sump pumps or shut-off valves to contain and isolate 5. Contact Cleanaway of similar service provider to pump out bund contents 6. Ensure spill kit available for any release from containment Advise site manager 7. Alert neighbours, EPA and Downer ZH manager as required, and if material harm has occurred. 8. Repair / Replace Tank 9. Refill Tank
Extreme Rainfall Events	<ol style="list-style-type: none"> 1. If safe to do so shut down plant as per shutdown procedure and isolate any other power, water sources. 2. Consider contingency measures for increased surface water and wastewater volumes. 3. Ensure all sediment and erosion controls for unsealed or exposed bunds/stockpiles are in good working order. 4. Keep bunds empty and take all measures to prevent them being filled with stormwater. 5. Keep chemicals stored above areas that are prone to inundation. 6. Secure all loose items to prevent them encountering floodwater. 7. Reduce any wastewater storage etc. on the site and consider the capacity of any effluent irrigation areas to manage your effluent under prolonged wet conditions. 8. Refer to Discharge of substance to drains (above) and consult Natural Events section of the site Emergency Management Plan.
Toxic emission to atmosphere	<ol style="list-style-type: none"> 1. Identify the substance if possible 2. Notify Management and Zero Harm 3. Follow emergency procedure as per SDS sheets which are located in the batch office. 4. Contain the substance, if possible. 5. Alert neighbours, EPA and SafeWork NSW
Dust Emissions from Site	<ol style="list-style-type: none"> 1. Determine the cause of the dust emissions and if possible, immediately address the cause (i.e. turn off plant/equipment). 2. Wear correct PPE for task 3. Implement most suitable management measure for task. Management measures for this may include: <ol style="list-style-type: none"> a. sweep roadways and hardstand b. Turn on sprinkler/water systems to wet down source. Ensure there is no excess runoff into storm water system. c. Cover stockpiles d. Turn off asphalt plant and inspect baghouse or plant for potential cause of emission 4. Clean PPE and wash hands thoroughly following task. 5. Advise site manager 6. Alert neighbours, EPA and Downer ZH manager as required, and if material harm has occurred.



Emergency Event	Response/ Rescue Method
	7. Investigate Incident

A 'minor environmental incident' is where there has been no potential or actual material harm to the environment. Examples are excessive dust sighted by the site team or a small, contained hydrocarbon spill that does not leave a site boundary and are cleaned up without residual on-site environmental harm.

Minor environmental incidents will still be handled under the process outlined except there will be no requirement for government notification.



16.1 Product Spills

In the event where of a Product Spill or Minor Environmental incident:

1. Incident Identified

It is the responsibility of each Downer or Subcontract employee to be vigilant in the recognition of potential environmental conditions that may lead to environmental incidents. On identification;

2. Can the Incident be contained locally?

In determining whether the incident can be contained locally, employees involved must consider the risks to personal health and safety, protection of plant and property and protection of the environment including blocking drains, covering pits etc. If there is any doubt as to local containment, the appropriate Emergency Services must be called.

3. Call Emergency Services

In the event of an incident that is beyond local containment capability, notify the emergency services.

If required by legislation, Downer (through Regional Zero Harm Manager) will notify the relevant government authorities of the incident, including how the incident occurred, measures that have been undertaken to rectify the situation and any impacts that the incident has had on the environment.

4. Employ Containment Procedures

Once an incident has been identified, all efforts must be undertaken to contain and minimise the effect of the incident on the environment. This can be achieved by isolating the cause and erecting suitable barriers to prevent the spread or flow of the particular incident.

5. Notify the Responsible Manager

Every environmental incident must be reported to the Responsible Manager as soon as is practically feasible; no matter how insignificant the incident may appear. The Responsible Manager is required to contact & liaise with the nominated Downer Zero Harm Manager.

6. Reporting within INX

The Responsible Manager must be notified of every single environmental incident as soon as practically feasible. He/she shall co-ordinate the cleanup and rehabilitation. The Responsible Manager shall detail and record the events within **INX**, which encompasses the following:

- Location of incident;
- Nature of incident;
- Time of incident;
- Duration of release;
- Environmental damage caused, threatened or suspected.
- Immediate control action;
- Sequence of Events and Root Cause;
- Follow up controls to prevent further harm to the environment.

7. Instigate Clean up and Rehabilitation

The Responsible Manager has the responsibility of co-ordinating the clean-up and rehabilitation of the affected site to an acceptable standard.

All minor or major incidents will be recorded in **Downers INX system** as outlined in **Section 16.1**.

16.2 Duty to notify

Under the provisions of the POEO Act, there is a duty to notify any incident that has caused or threatens to cause material harm to the environment and all relevant information about the incident. For example, where



an Incident has occurred and retained onsite, there is no duty to notify, until a release results in a receiving environment may be harmed.

When notifying relevant Authorities, EPA and other relevant authorities be provided with a written incident notification via the Major Projects website within 24 hours after the incident.

A written notification will:

- Identify the development and application number.
- Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident).
- Identify how the incident was detected.
- Identify when the Applicant became aware of the incident.
- Identify any actual or potential non-compliance with conditions of consent.
- Describe what immediate steps were taken in relation to the incident.
- Identify further action(s) that will be taken in relation to the incident.
- Identify a site contact for further communication regarding the incident.

16.3 Occurrence Investigation and Incident Reporting

Occurrences shall be notified and investigated. Notifications will be made in accordance [DG-ZH-PR006 Incident Management Procedure](#) and all occurrences, incidents and near misses will be recorded on the INX InControl online database.

At the first opportunity following any occurrence, the Zero Harm Team should be advised.

Team will be notified. This notification provides some initial details of the occurrence and also initial actions taken following the occurrence. The Occurrence will be documented as per [DG-ZH-PR006 Incident Management Procedure](#).

Following the completion of the Incident/Hazard Report form it will be used to record the occurrence in the INX InControl System.

The Environmental Manager is responsible for the investigation and notification of all environmental occurrences.

The Occurrence Report will be registered and tracked internally with Actions arising from the INX InControl System for tracking and close out.

Occurrences with significant consequence or potential may be subject to investigation of greater depth and may take the form of a Downer ICAM investigation. The Zero Harm Manager will make the determination on the level of investigation required.

16.4 Preservation of the Scene

In any situation where there is the possibility of a statutory investigation or coronial inquiry, the Emergency Response Team must ensure that all evidence relating to the incident is preserved and not interfered with.

In addition, that any cleaning up, recovery, repair apart from that necessary to bring the emergency under control, does not occur without approval of investigating officers. Ideally, measures should be taken to barricade off the immediate area to ensure that there is as little disturbance as possible at the scene so as to keep the area as non-disturbed as possible.

In the event that a non-disturbance notice is issued the receiver of this notice must notify the Zero Harm Safety Advisor or Site Manager immediately.

16.5 Post-incident notification procedures

The following general clean up procedure is to be followed:

- Assessment - assess best clean up procedures for each incident based on the pollutant and site issues;



- Remedial Action - remove contaminated soil, wastewater and used spill equipment to an appropriate place within the licensed premises for licensed waste disposal and/or remediation;
- Ongoing Actions - following an incident the following must be undertaken:
 - undertake further monitoring/ testing if required;
 - be documented as per [DG-ZH-PR006 Incident Management Procedure](#) (within 48 hours of incident);
 - organise restocking of spill equipment;
 - complete reports to Authorities, as necessary;
 - implement corrective actions to avoid reoccurrence.

16.6 Management of Injuries

After initial attendance at hospital, if injuries will require ongoing treatment or check-ups, a local medical practitioner will be utilised for return to work requirements.

16.7 Recovery

Recovery activities are primarily concerned with restoring the work site/ environment to its pre-emergency condition. Depending on the nature/effect of the emergency, this may include reconstruction of the physical infrastructure, restoration of the emotional, social, economic and physical well-being of the workforce/workplace. During recovery operations, actions are taken to minimise the recurrence of the hazard and/or lessen its effects.

Post Emergency Activities

The debriefing shall review (but not be limited to) the following;

- Staffing
- Plant and equipment
- Processes and procedures
- Material inventories
- Difficulties encountered
- Access to any Employee Assistance Programs

17 TESTING EMERGENCY RESPONSE PROCEDURES

Emergency evacuation and pollution incident response drills will be conducted at regular intervals to verify the effectiveness of response arrangements and refresh emergency responders in requirements and their functions.

As a minimum:

- evacuation drills will be conducted Annually at each Building and department.
- response procedures for Pollution scenarios with a high likelihood of occurring, as identified in the Emergency Management Plan and PIRMP, will be tested Annually (minimum), and within one month of any pollution incident occurring.
- records of emergency evacuation and pollution incident response drills will be maintained and stored within INX.
- evacuation and pollution incident response drills will be assessed by the Supervisor to identify any deficiencies or improvements required and the assessment documented; and
- where deficiencies or improvements are identified, the Supervisor/Manager will generate an action plan and monitor progress to completion.

Testing is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and that each plan is capable of being implemented in a workable and effective manner.



The two usual methods of testing are undertaking desktop simulations and practical exercises or drills. Testing must cover all components of the plan, including the effectiveness of training.

Drills are conducted then evaluated and recorded using [DA-ZH-FM015.5 Emergency Drill Observers Checklist](#). Records shall be kept within INX and sent to the Site Manager / Zero Harm Team for performance review.

A summary of Emergency Drills undertaken is shown in the table below:

Test Date	Version of PIRMP Tested	Incident Type Drilled	Emergency Drill Lead
4 October 2023	2.0	Chemical Spill Emergency scenario and response exercise	Chief Warden - Rick Hollindale

18 EMERGENCY CONTACTS

Downer Australia Internal Emergency Contacts			
24-Hour Emergency Number / Channel:			
Administration (contact number and hours):			
Downer Australia Personnel	Contact No.	After Hours No.	Details
Emergency Controller	4958 0300	0407 670 384	All Incidences and Emergencies
Emergency Response Team (ERT)	4958 0300	0407 670 384	All Incidences and Emergencies
First Aid Officer	4958 0300	0407 670 384	First Aid
Downer Australia External Emergency Contacts			
Ambulance, Fire, Police	000 Mobile: 112		Life Threatening Emergencies
Fire Brigade (local) 54 William Street Teralba NSW 2284	000	000	Fire and Chemical spills
Police (local) 97 Cary Street Toronto NSW 2283	000	000	Security matters
Medical			
Public Hospital- John Hunter Lookout Road New Lambton NSW 2305	4921 3000	4921 3000	Serious Injury
Medical Centre 57 Belford Street Broadmeadow NSW 2292	4978 6666	4978 6666	Injury



Royal Flying Doctor Service			
Poisons Information Centre	13 11 26	13 11 26	Poisons Information
Other Authorities as required by legislation			
Reportable following instruction with Regional Zero Harm Manager or delegate			
State Emergency Services	1300 729 579	1300 729 579	Notifiable incidents immediately
Local Council – Lake Macquarie	4921 0333	4921 0333	Notifiable incidents immediately
Department of Public Health John Hunter	4921 3000	4921 3000	Notifiable incidents immediately
Workplace Safety Regulatory Body (eg WorkSafe)	13 10 50	13 10 50	Notifiable incidents immediately
Environment Protection Authority	131 555	131 555	Notifiable incidents immediately
Supply Authorities:			Supply Issues
Electricity - Ausgrid	1300 851 986		
Water – Hunter Water	1300 657 657		

18.1 Community Notifications and Communication

Communicating with neighbours and the local community is an important element in managing the response to any pollution incident. Downer will provide accurate communications information to relevant stakeholders and the community regarding operational activities and environmental matters, including:

- Prior to commencement of operations: a program of commencement and details of mitigation measures to minimise community impacts.
- During and/or following Significant Environmental incidents where applicable, including any associated community impacts and mitigation measures.

In the event of a media or government representative approaching site or contacting workers:

- The immediate response is to tell them “I’m not the best person to talk too about the works”. Do not give them any information, photos or materials.
 - Immediately notify your Works Supervisor / Site / Operations Manager.
 - Ensure no statement (oral, written or photos) is made to media or government representative.

18.2 Media Requirements

Detail of any media or similar communication requirements. All requirements must be consistent with Downer’s Communication and Media processes.

Do not make any comments or liaise about any incidences to the media – this will be dealt with internally by authorised personnel as per the Downer Group standards and policies; [DG-ZH-ST014 Zero Harm Communication Standard](#), [DG-CA-PO002 Media Policy](#) and [DG-CA-PO001 Communication Policy](#).



19 EMERGENCY EVENT PUBLIC INFORMATION SOURCES

Organisation	Medium	Contact
NSW Ministry for Police and Emergency Services	Website	www.nsw.gov.au
NSW State Emergency Service (SES)	Website	www.ses.nsw.gov.au
NSW Rural Fire Service	Website	www.rfs.nsw.gov.au
NSW Police Force	Website	www.police.nsw.gov.au
NSW Ambulance	Website	www.ambulance.nsw.gov.au
Bureau of Meteorology	Website	www.bom.gov.au

20 EMERGENCY RESPONSE TEAM ACKNOWLEDGEMENT

As a member of the Emergency Response Team for Teralba, by signing this Pollution Incident Response Management Plan I acknowledge that I have read the site-specific plan in full and understand the designated responsibilities of my role.

Name	Role in Emergency Response Team	Date	Signature



ANNEX A HAZARDOUS MATERIAL SCREENING THRESHOLDS FOR STORAGE

Table 6.30 Hazardous Materials Inventory

Material	Storage Type/Location	ADG Code ¹ Class (PG)	Estimated Project Storage Capacity (kg)	Screening Threshold (kg)	Trigger SEPP 33
Flammable Liquids (Toluol, Ethanol)	Packages / Laboratory Flammable Liquids Store	3 (II)	1,005	5,000	No
Diesel Tanks (x 2)	Above ground tanks	C1	60,000 (2 x 30,000)	- ²	NA
Bitumen Tanks (x 4)	Above ground tank	9 (III)	339,200 (4 x 84,800)	- ²	NA
LPG	Cylinders / Workshop	2.1	60	10,000	No
Acetylene	Cylinders / Workshop	2.1	40	500	No
Spray Paint	Packages / Workshop	2.1	60	500	No
Flammable Liquids (Kerosene, Brakleen)	Packages	3 (III), 3(II)	60	5,000	No

1 ADG Code – Australian Dangerous Goods Code

2 No SEPP 33 quantity screening thresholds for these materials

Table 6.31 Transportation Screening Thresholds

Material	ADG Code ¹ Class (PG)	Bulk or Package	Vehicle Movements		Minimum Quantity (T)
			Annual Threshold	Weekly Threshold	
Flammable Liquids	3 (II), 3 (III)	Package	>750	>45	10
Bitumen	9 (III)	Bulk	>1,000	>60	no limit
LPG, Acetylene	2.1	Package	>500	>30	5

1 ADG Code – Australian Dangerous Goods Code



ANNEX B – ENVIRONMENTAL IMPACT AND CONSEQUENCE CLASSIFICATION

Environmental incidents shall be classified initially in accordance with the “Risk Consequence” descriptors for “Environmental and Community Impact” (see Column “B”). The examples/ impacts descriptors included in columns “C” to “I” are provided to assist in determining the appropriate environmental incident classification/ category. Table adapted from DG-ZH-PR006 Incident Management Procedure.

Incident Classification	Risk Consequence	Impact Descriptors						
		Regulatory Licence/ Approvals (C)	Spills/ Chemical and Hydrocarbon Storage (D)	Water (E)	Waste Disposal (F)	Flora/ Fauna/ Biosecurity (G)	Air, Odour, Dust, Fume Noise and Vibration (G)	Heritage ⁱⁱ / Archaeological (I)
Downer Severity Rating Level (A)	Environmental and Community Impact ⁱ (B)							
6	Catastrophic widespread impact on the environment resulting in irreversible damage; and/ or Complete loss of trust by affected community leading to long term social unrest and outrage.	Prolonged loss of multiple Regulatory licence/approval for business-critical infrastructure.	Spills causing “material harm” ⁱⁱⁱ and widespread environmental impact that cannot be contained within a waterway (e.g. dam, creek, groundwater source, wetland, or drainage system) or other environmentally sensitive areas. Requires 3rd party intervention and prolonged monitoring, remediation and on-going management attention.	Unauthorised works to sensitive waterway or groundwater source causing widespread irreversible damage. Prolonged non-compliant contamination ^{iv} of waterway, groundwater or catchment area (>5 days), causing widespread environmental impact.	Incorrect disposal (dumping) of regulated waste over a sustained period. Requires 3rd party intervention and on-going management attention.	Death of numerous endangered species. Unauthorised widespread clearing or damage to endangered vegetation (communities).	Generation of air, odour, dust, noise or vibration resulting in widespread damage, e.g.: vibration that causes extensive structural damage uncontrolled release of hazardous emissions (e.g. asbestos dust, or toxic gas). Prolonged and recurring post blast fume events incurring ongoing complaints and action associated with prosecution and potential termination of contract.	Irreparable damage to highly valued sites, structures, or objects of heritage/ archaeological significance.



Incident Classification	Risk Consequence	Impact Descriptors						
		Regulatory Licence/ Approvals (C)	Spills/ Chemical and Hydrocarbon Storage (D)	Water (E)	Waste Disposal (F)	Flora/ Fauna/ Biosecurity (G)	Air, Odour, Dust, Fume Noise and Vibration (G)	Heritage ⁱⁱ / Archaeological (I)
5	Significant impact on the environment; and/or Prolonged community outrage.	Prolonged loss of Regulatory licence/approval for business-critical infrastructure.	Spills that cause “material harm” ³ and the extent of impact cannot be restricted within a waterway (e.g. dam, creek, groundwater source, wetland, or drainage system) or other environmentally sensitive areas. Requires 3rd party intervention and on-going management attention.	Unauthorised works to sensitive waterway or groundwater source resulting in “material harm” ³ . Sustained and non-compliant discharge that delivers large volumes in a short period; or occurs over several days. Persistent discharge of pollutant/ contaminated water or sediment >3 days.	Incorrect disposal (dumping) of regulated waste. Any illegal or unpermitted waste dumping outside the mining lease. Requires 3rd party intervention and on-going management attention.	Death of one endangered species or significant number of species of conservation significance. Unauthorised clearing of endangered vegetation (communities). Introduction of a declared weed, pest or plant disease that threatens ecosystems and requires longer term control to eradicate >5 years with continual management.	Generation of air, odour, dust, noise or vibration emissions causing prolonged periods (>5 days) of inconvenience or disruption to the environment. Consecutive breaches of licences, permits or approval conditions. Recurring post blast fume events that breach exclusion zone, incurs prosecution and potential suspension of contract.	Disturbance causing significant damage to a highly valued site(s), structures, or objects of heritage/ archaeological significance.
4	Significant impact or material harm ³ on the environment; or A notifiable incident ⁴ ; or Long term community irritation	Short term loss of Regulatory licence/approval for business-critical infrastructure.	Spills that cause “material harm” ³ and enter sensitive land or sensitive waterways (e.g. dam, creek, groundwater, wetland, or drainage system).	Unauthorised works to waterway, groundwater source or associated engineered structure resulting in “material harm” ³ . Dam or sediment control failure leading to	Incorrect disposal (dumping) of non-regulated waste. Requires 3rd party intervention and on-going management attention.	Isolated death of multiple individuals from a species (flora and fauna) of conservation significance. Unauthorised clearing of land or vegetation areas	Any activity (blast, construction or maintenance) that is in breach of air, odour, dust, noise or vibration emissions that damages property or infrastructure.	Disturbance causing significant harm to a known heritage or archaeological site of moderate to high significance or land subject to native title or has Maori land status.



Incident Classification	Risk Consequence	Impact Descriptors						
		Regulatory Licence/ Approvals (C)	Spills/ Chemical and Hydrocarbon Storage (D)	Water (E)	Waste Disposal (F)	Flora/ Fauna/ Biosecurity (G)	Air, Odour, Dust, Fume Noise and Vibration (G)	Heritage ⁱⁱ / Archaeological (I)
	leading to disruptive actions and requiring continual management attention.		Spill can be contained, cleaned-up and remediated.	discharge of sediment laden water to a waterway (e.g. dam, creek, groundwater, drainage system) or other environmentally sensitive areas. Sustained and non-compliant discharge that delivers large volumes in a short period or occurs over several days.	Any illegal or unpermitted waste dumping inside the mining lease, including the disposal of waste in dumps or backfill.	of conservation significance. Introduction of declared weed, pest or plant disease that can be eradicated within 1-5 years, with continual management.	Consecutive non-compliance (internal) or breach of licence, permit or approval conditions requiring intervention from customer or regulator. Post blast fume event that breaches exclusion zone or regulator issues fine.	Situation that is considered of concern by customer or traditional owners or requires intervention from the regulator.
3	Moderate impact or material harm ³ on the environment; or A notifiable incident ⁶ ; or Short term community unrest and dissention.	Licence/ Approval breach notifiable to regulator. Works commence without an environmental licence/ approval. Works suspended due to non-conformances of Licence/ Approval	Spills that cause "material harm" ³ to non-sensitive land or non-sensitive waterways.	Unauthorised works to a waterway, groundwater source or associated engineered structure. Brief/ limited volume of water discharge that was monitored and found to be non-compliant, or unmonitored and presumed to be non-compliant (exceeds permit or water quality limits) resulting in	Regulated or non-regulated waste being taken to a waste facility not licensed to accept that type of waste (e.g. dangerous goods or hazardous materials disposed of at general landfill). Regulated waste being transported by unlicensed	Deaths of multiple individuals of a common species. Isolated death of a single individual of one species (flora or fauna) of conservation significance. Unauthorised clearing of land or vegetation of low conservation significance. Introduction of a declared weed, pest or plant disease that can	Any complaints where air, odour, dust, noise and vibration emissions cause sustained periods (repetitive or >1 day) of inconvenience and are found to be non-compliant. Any activity (blast, construction or maintenance) that is in breach of air, odour, dust, noise and vibration emissions limits.	Disturbance causing moderate harm to a known heritage or archaeological site of moderate significance or land subject to native title or has Maori land status that may require notification to the regulator.



Incident Classification	Risk Consequence	Impact Descriptors						
		Regulatory Licence/ Approvals (C)	Spills/ Chemical and Hydrocarbon Storage (D)	Water (E)	Waste Disposal (F)	Flora/ Fauna/ Biosecurity (G)	Air, Odour, Dust, Fume Noise and Vibration (G)	Heritage ⁱⁱ / Archaeological (I)
Downer Severity Rating Level (A)	Environmental and Community Impact ⁱ (B)			notification to the regulator.	company or individual.	be eradicated within 12 months.	Failure to notify local community of activities as required by licence, permit or approval. Post blast fume event that does not breach exclusion zone but has multiple community complaints.	
2	Minor impact on the environment; or Community complaint founded requiring intervention and management attention.	Administrative Breach to licence or approval notifiable to the regulator. E.g. didn't submit an annual return on time. Works commence without an environmental licence or approval where one is required.	Any spill outside the secondary containment or operational area or a spill that can be cleaned up and managed appropriately. Any spill that does not cause "material harm" ³ .	Any unplanned water discharge that resulted in a minor exceedance that does not trigger notification to the regulator. Water delineation structures (e.g. bunds or other secondary containment) failed to prevent contamination of waterway (e.g. dam, creek, groundwater, wetland, or drainage system) or other	Non-regulated waste being taken to a facility not licensed to accept that type of waste. Littering from business related activities blown or disposed of away from work site or associated with transport and storage of waste.	Deaths of multiple individuals from a common species. Unnecessary or unauthorised disturbance of vegetation or land. Introduction of a non-declared weed, pest or plant disease that can be eradicated within 3 months.	Generation of air, odour, dust, noise and vibration emissions causing temporary period (<1 day) of inconvenience. Post blast fume event which does not breach blast exclusion zone and incurs single, one-off, community complaint. Import/ export or use of a regulated substance (e.g. ozone depleting) without authorisation or outside licence/	Disturbance causing minor harm to a known heritage or archaeological site of low significance that does not trigger notification to the regulator.



Incident Classification	Risk Consequence	Impact Descriptors						
		Regulatory Licence/ Approvals (C)	Spills/ Chemical and Hydrocarbon Storage (D)	Water (E)	Waste Disposal (F)	Flora/ Fauna/ Biosecurity (G)	Air, Odour, Dust, Fume Noise and Vibration (G)	Heritage ⁱⁱ / Archaeological (I)
				environmentally sensitive areas.			approval conditions.	
1	Negligible impact on the environment; or No or unfounded community complaint.	Administrative Breach to licence that can be rectified immediately. Non-conformance to a licence outside of Downer control – e.g. rainfall exceeds stormwater treatment design criteria	Minor spills contained within immediate area. Spills contained within the secondary containment (e.g. bund) or operational area (e.g. mine site).	A water discharge with negligible harm to the waterway.	Waste going into the incorrect receptacle. Recycling material being disposed of incorrectly when recycling facilities are available.	One off or isolated interaction or death of a single common species (e.g. grey kangaroo or established tree or shrub struck by vehicle).	One-off or isolated air, odour, dust, noise and vibration emission. Post blast fume event does not breach exclusion zone, no associated community complaint.	Unknown heritage or archaeological object found unexpectedly, and disturbance occurred, causing negligible harm.

ⁱ One or more of the criteria in the Impact Descriptors columns triggers the classification/ level to be declared for an incident. The incident classification will be taken as the highest number of all the impact descriptors.

ⁱⁱ "Heritage" includes European and non-European, known or unknown items of significance such as buildings, landscapes, monuments, moveable objects and non-European heritage such as items of significance to local community (e.g. burial sites, shell middens, scar trees, or engravings).

ⁱⁱⁱ Material Harm – for classifying environmental incidents for Downer, harm to the environment is "material" if:

- it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
- it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000; and
- 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, including the costs of consultants and associated reports. Consideration is to be given to environmental harm caused beyond the immediate vicinity of where the pollution incident occurred.

^{iv} Contamination of water includes anything that alters the physical, chemical or biological properties of the receiving waters.

^v Notifiable incident – any incident classified at ≥ level 3, where there is a duty to notify the relevant authority(s) of a pollution incident, where "material harm" to the environment is caused or threatened. The definition of "material harm" differs slightly between the regulatory jurisdictions so it is important to check the relevant legislation.



ANNEX C – SITE RISK REGISTER

#	Type	Element	Risk / Opportunity Description	Owner	Potential Causes	Potential Impacts	Existing Controls	RCE	Primary Cons.	Cons. Rating	Likelihood	CR (Hidden)	Like (Hidden)	Top 5	Rating	Task Description	Treatment Owner	Due Date	Status
1	Risk	Zero Harm	Waste Disposal	Site Management	Waste disposal not following regulations	Damage to the environment	Site induction, daily toolbox, management plans, all waste to be disposed in appropriate manner	Effective	Environment & Community	1	Rare (<1%)	1	1	2	D	Existing controls are communicated on a daily basis through Pre-Start and Site Induction	Site Management	On-Going	On Schedule
2	Risk	Zero Harm	Contact with Chemicals	Site Management	Incorrect handling procedures / incorrect storage	Damage to the environment	Site induction, daily toolbox, SWMS, all personnel trained in MSDS requirements / hazardous substances stored and labelled correctly, bunds	Effective	Environment & Community	2	Rare (<1%)	2	1	3	D	Existing controls are communicated on a daily basis through Pre-Start and Site Induction	Site Management	On-Going	On Schedule
3	Risk	Zero Harm	Bushfires	Site Management	Fire, lightning strike, car accident, cigarette butt	Injury to personnel, damage to property	Emergency plan, emergency wardens, evacuation procedures and diagrams, communication with local RFS	Effective	Health and Safety	3	Unlikely (1%-10%)	3	2	5	C	Existing controls are communicated on a daily basis through Pre-Start and Site Induction	Site Management	On-Going	On Schedule
4	Risk	Zero Harm	Emissions of dust from site	Site Management	Disrepair of asphalt plant compensating seals, truck/loader movements on unsealed surfaces	Injury to personnel, breach of environmental requirements	Plant maintenance, reduced vehicle speed, water cart as required, cleanliness of sealed surfaces, SWMS, stockpile management	Effective	Environment & Community	1	Unlikely (1%-10%)	1	2	3	D	Existing controls are communicated on a daily basis through Pre-Start and Site Induction	Site Management	On-Going	On Schedule
5	Risk	Zero Harm	Contaminants exiting site via stormwater	Site Management	Ineffective erosion controls, improper storage of chemicals/liquids, gravel/debris on sealed surfaces	Breach of environmental requirements	Erosion and sediment controls maintained, SWMS, chemicals stored in banded areas, site cleanliness	Effective	Environment & Community	2	Unlikely (1%-10%)	2	2	4	D	Existing controls are communicated on a daily basis through Pre-Start and Site Induction	Site Management	On-Going	On Schedule